

# Final EA for Signature and Approval

## Environmental Assessment

### National Park Seminary Historic District

Forest Glen Annex  
Walter Reed Army Medical Center



Prepared for:

**Walter Reed Army Medical Center**

Prepared by:

**U.S. Army Corps of Engineers  
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## **Environmental Assessment**

This Environmental Assessment addresses reporting the National Park Seminary Historic District to be an excess property, which will initiate the disposal process. It provides an analysis of the proposed action and alternatives and their potential environmental and socioeconomic effects, as required by Army Regulation 200-2, the National Environmental Policy Act, and the President's Council on Environmental Quality regulations.

SECTION 1.0 PURPOSE, NEED, and SCOPE describes the relevant background information on the proposed action and summarizes the objectives and scope of the analyses required in this Environmental Assessment.

SECTION 2.0 DESCRIPTION OF PROPOSED ACTION provides a detailed description of the proposed action, including its implementation.

SECTION 3.0 ALTERNATIVES discusses the alternatives to the proposed action analyzed in this Environmental Assessment, including the No-Action Alternative.

SECTION 4.0 AFFECTED ENVIRONMENT describes baseline environmental and socioeconomic conditions.

SECTION 5.0 ENVIRONMENTAL AND SOCIOECONOMIC CONSEQUENCES contains the environmental and socioeconomic effects of the proposed action and alternatives.

SECTION 6.0 FINDINGS AND CONCLUSIONS summarizes the potential adverse effects and actions planned to reduce or minimize them.

SECTION 7.0 LIST OF PREPARERS identifies the people who prepared the report and their disciplines.

SECTION 8.0 DISTRIBUTION LIST identifies the people who received copies of the document.

SECTION 9.0 REFERENCES provides bibliographical information for sources cited in the text of the report.

SECTION 10.0 LIST OF PERSONS CONSULTED identifies the people who supplied information.

### **APPENDICES**

APPENDIX A	Public Involvement and Agency Coordination
APPENDIX B	Report of Excess Real Property
APPENDIX C	NHPA Section 106 Consultation
APPENDIX D	Air Quality Standards and Conformity
APPENDIX E	Description and Condition Assessment of Buildings

An ACRONYM LIST (fold-out) is provided immediately following the appendices.



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# 1. Purpose, Need, and Scope

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## 1.1 Purpose and Need

The National Park Seminary Historic District (NPSHD) is a property owned by the Walter Reed Army Medical Center (WRAMC). The NPSHD is part of WRAMC's Forest Glen Annex, which is located in Montgomery County, Maryland, about 1.5 miles north of the District of Columbia (Figure 1-1). The NPSHD is an approximately 27-acre parcel of land with 29 buildings, 24 of which are historic. The Army acquired the property in 1942. The NPSHD has been listed on the National Register of Historic Places (NRHP) since 1972.

Because of changed and reduced mission requirements, the Department of the Army no longer needs or can afford to adequately maintain the existing historic buildings on the NPSHD. The purpose of the proposed action is to provide for the continued viability of the NPSHD, by allowing the adaptive reuse of the property to be undertaken by another party. The need for this action respects the historic context and value of the property, while recognizing the fiscal limitations inherent in continued Army maintenance and ownership.

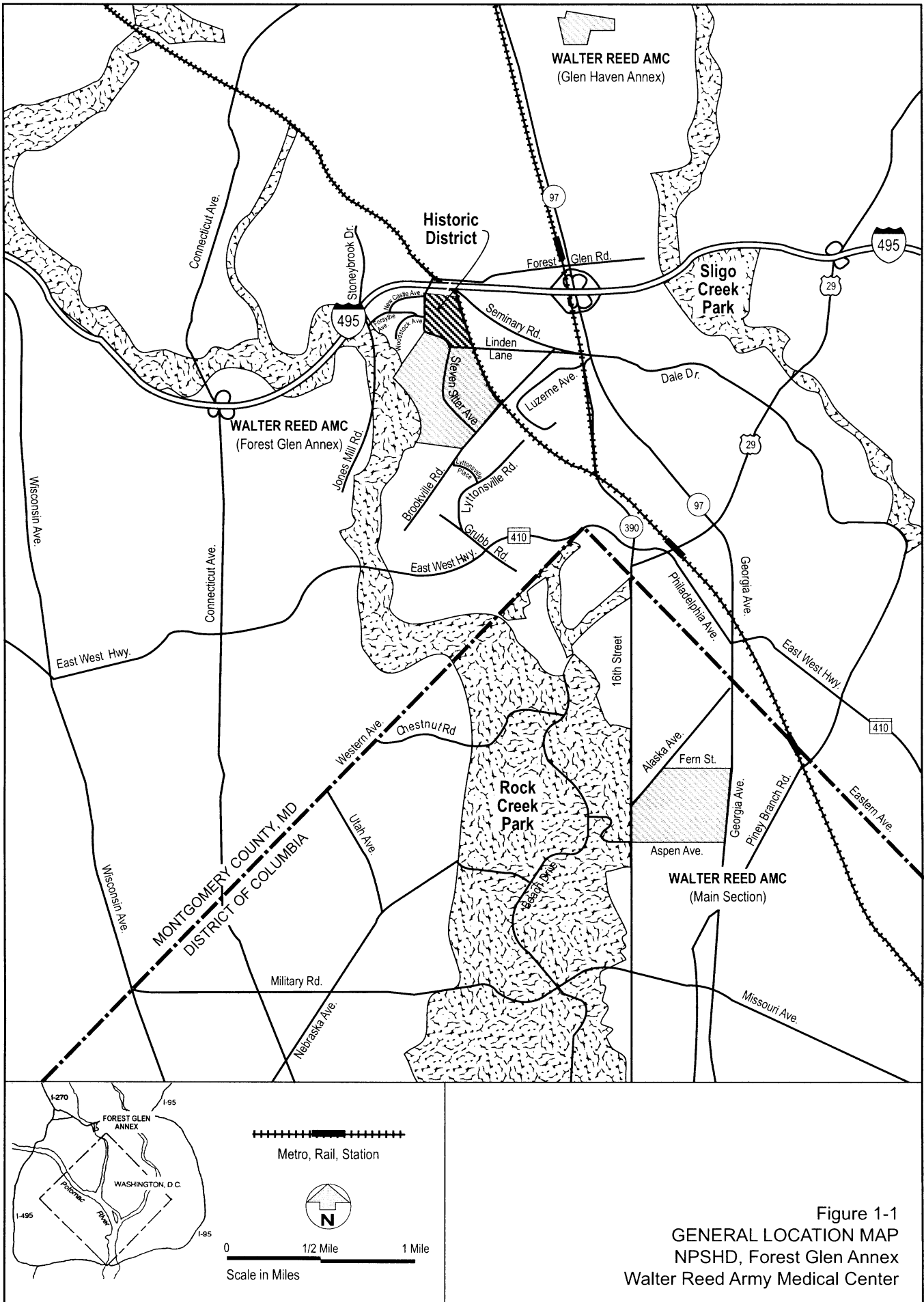
## 1.2 Proposed Action

The Army proposes to report the NPSHD, in its entirety, as excess to the General Services Administration (GSA), in accordance with Army Regulation (AR) 405-90 ("Disposal of Real Estate" May 10, 1985) and federal property law. Under the Federal Property and Administrative Services Act (FPASA) and its accompanying regulations, the GSA is responsible for the disposal of excess federal property. The Army's proposed action will begin the disposal process by providing notice to the GSA that the NPSHD is excess to the Army's needs.

This Environmental Assessment (EA) identifies and analyzes the potential effects on the natural and human environment that could be associated with the Army's proposed action, which is described in more detail in Section 2. This EA has been prepared in accordance with the National Environmental Policy Act of 1969 (NEPA) and with the regulations implementing NEPA, published by the Council on Environmental Quality (CEQ) as 40 *Code of Federal Regulations* (CFR) parts 1500-1508 (July 1, 1986), and by the Army as AR 200-2 ("Environmental Effects of Army Actions" December 23, 1988).

## 1.3 Background

The Department of Defense has been downsizing since the end of the Cold War. The functions at WRAMC have been scaled back as part of this process. The Army has either replaced or renovated most of the buildings that are needed to meet current WRAMC missions and has consolidated functions in these more suitable buildings.



By contrast, the NPSHD property has been mostly vacant for an extended period of time. Neither the buildings nor the land are needed to support any current or future WRAMC missions or mobilization requirements. If a mission is identified in the future, the NPSHD property could not be economically adapted for Army use, due to both the deteriorated state of the buildings and the historic and cultural significance attached to the buildings by the local community. The existing buildings in the NPSHD have an outdated layout, are prohibitively expensive to operate and maintain, and would require major rehabilitation to become even minimally functional for WRAMC's mission-related activities, most of which require high-technology laboratory space.

Because of the age and condition of these historic buildings, their maintenance diverts a substantial amount of annual funding from the maintenance of WRAMC's mission-critical facilities. Sufficient funding has not been available to fully stabilize and reverse the ongoing deterioration of these historic buildings. Therefore, the Army must examine other methods to provide for this property.

## 1.4 Decision to Prepare an EA

On June 3, 1997, the Army published a "Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) on the National Park Seminary Historic District Located at the Walter Reed Army Medical Center" in the *Federal Register* (see Appendix A). The intended purpose of the EIS was to evaluate a range of options for the reuse of the NPSHD, including demolition of buildings, rehabilitation and reuse of buildings by the Army, or disposal of the property.

After considering the issues raised by public and agency comments, inquiries by interested parties, and the ongoing processes of military facilities planning and master planning, the Department of the Army determined that WRAMC does not have a current or foreseeable future need for the NPSHD property and that it would be in the best interests of all concerned if the stewardship and adaptive reuse of the NPSHD were to be accomplished by another party.

As a result, the proposed Army action was changed from reusing the NPSHD to reporting the NPSHD to GSA as an excess property. The EIS for Army reuse of the NPSHD was discontinued and has been replaced by this EA. (The measures taken to notify interested parties of this change are presented in Section 1.7, "Public Involvement.") As discussed below, an EA is the appropriate NEPA document to assess the environmental and socioeconomic effects of the Army's current proposed action and alternatives.

The previous proposed action and alternatives for reuse of the NPSHD, as described in the 1997 NOI, included the possibility that the Army could demolish some or all of the district's historic buildings to make it more feasible to reuse the property. According to the Army's NEPA regulations (AR 200-2, Sections 6-2 [b] and [c]), an EIS is required when a proposed action has the potential to have a "significant adverse effect on properties listed on ... the National Register of Historic Places."

The current proposed action of reporting the NPSHD as an excess property does not automatically require an EIS. An EA is prepared to determine the extent of impacts of a



proposed action and to decide whether or not those impacts are significant and therefore would require an EIS (AR 200-2, Section 5-1). An EA normally is prepared for “proposals that may lead to excessing Army real property” (AR 200-2, Section 5-3 [I]) and is required when an action has “the potential for ... some harm to culturally or ecologically sensitive areas” (AR 200-2, Section 5-2 [d]).

Should the property be declared excess by the Army, then GSA (as the property disposal agent) will be responsible for further evaluating the potential environmental impacts associated with disposal of the property in a separate NEPA document.

## 1.5 Scope

The Army proposes to prepare and forward a “Report of Excess Real Property” to the GSA, to begin the disposal process for the NPSHD property. GSA then will begin its process of screening, marketing, and disposing of the property. Under the regulations governing federal property disposal, the Army as the holding agency will retain custody and accountability for the excess property, pending its transfer to another federal agency or its disposal to a non-federal entity (AR 405-90, Section 4-3). The proposed action is described in more detail in Section 2, “Description of Proposed Action.”

This EA analyzes the potential environmental and socioeconomic effects that are associated with the proposed action and alternatives. The alternatives considered in this EA address a set of reasonably foreseeable options for the immediate future of the land and buildings of the NPSHD, including declaring the property excess or retaining the property indefinitely in its current underutilized status. The specific alternatives evaluated in this EA are presented in Section 3, “Alternatives.”

The CEQ’s regulations for implementing NEPA encourage federal agencies to concentrate NEPA analyses on the issues relevant to the specific action for which decisions need to be made (“issues which are ripe for decision” – Title 40, *Code of Federal Regulations*, Part 1502.28) and, if necessary, to prepare supplemental documents or subsequent NEPA documents at a later stage. The decision now is whether to report the NPSHD as excess property, thereby allowing the GSA to begin the process of marketing and disposal.

Because GSA will be responsible for screening and marketing the NPSHD property for disposal (if the property is declared excess), consideration of specific reuse alternatives is beyond the scope of the Army’s EA. The ultimate reuse of the property will depend greatly on the outcome of GSA’s screening and marketing process. The specific entities that would be willing and able to acquire the property, and the types of adaptive reuse that could be made of the property by these entities, will be unknown until this process is further underway. Therefore, this EA does not evaluate any specific reuse alternatives or scenarios. However, the potential effects of disposal and reuse of the NPSHD by parties other than the Army are evaluated in this EA as indirect and cumulative effects of the Army’s proposed action to declare the property excess.

As noted, GSA will be responsible for considering any relevant disposal alternatives and their potential impacts, in compliance with the requirements of NEPA, at a time when decisions need to be made about that subsequent transfer or disposal action.

## 1.6 Impact Analysis Performed

This EA identifies, documents, and evaluates the relevant environmental and socioeconomic effects of excessing or retaining the NPSHD property. Conditions at the NPSHD and the surrounding area are described in Section 4, “Affected Environment.”

An interdisciplinary team of environmentalists, biologists, planners, economists, engineers, historians, scientists, and military experts has analyzed the proposed action of declaring the property excess (including interim maintenance of the property by the Army and GSA), and the alternatives to the proposed action, against the existing conditions and has identified the relevant beneficial and adverse effects associated with the action. These potential effects, or impacts, are described in Section 5, “Environmental and Socioeconomic Impacts.”

This EA analyzes the *direct impacts* of the proposed action (those caused by the proposed action and occurring at the same place and time), the *indirect impacts* of the proposed action (those resulting from the proposed action but caused by parties other than the Army, occurring later in time, or occurring farther in distance, but still reasonably foreseeable), and the *cumulative impacts* of the proposed action (those resulting from the incremental impact of the proposed action when added to other past, present, or future actions of the Army or other parties).

The potential effects of disposal and reuse of the NPSHD by parties other than the Army are evaluated in this EA as *indirect* and *cumulative* effects of the proposed action of excessing the property, to the degree that Army actions potentially could contribute to or offset such effects. Analysis of these indirect impacts is based on an understanding of the constraints placed on potential reuse by local zoning and planning, physical conditions, and other factors beyond the Army’s control.

## 1.7 Public Involvement

The NEPA process is designed to involve the public in federal decision-making. Comments from concerned individuals, agencies, and organizations are welcome at any time during preparation of an EA. Measures to involve the public in the NEPA process for the NPSHD have included the following:

- Publishing notices in local newspapers (the *Washington Post*, the *Washington Times*, and the *Montgomery Journal*) and in the *Federal Register*.
- Providing the name and address of a WRAMC point of contact in all public notices and other public information materials (see Appendix A).
- Compiling and maintaining a mailing list of interested agencies and individuals.
- Placing copies of this EA and previous studies about the NPSHD in the Silver Spring Library and advertising the address of the library in public notices.
- Conducting open public meetings to inform interested parties about the preparation of NEPA documentation for the NPSHD and to obtain public input.

- Consulting formally with responsible resource agencies, including the US Fish and Wildlife Service (USFWS), the Maryland State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP), the Maryland-National Capital Parks and Planning Commission (M-NCPPC), and the National Capital Planning Commission (NCPC) (Appendix A).

After the Army's NEPA process is completed, additional opportunities for public involvement will occur during the GSA's screening process (see subsection 2.2.2 "Disposal Process") and during GSA's subsequent NEPA process.

### 1.7.1 Scoping

The first step in preparing a NEPA document is to scope, or identify, the issues to be addressed in the analysis and documentation. Public and agency participation is solicited as early as possible to help identify the critical issues to be analyzed in the document. Scoping also can help refine the alternatives to be analyzed.

In the case of the NPSHD, the scoping process was initiated in 1997 by a Notice of Intent to prepare an EIS for reuse of the NPSHD. The EIS scoping process contributed to the subsequent change in proposed action. Appendix A includes a summary of the scoping that was carried out in 1997, beginning with the NOI to prepare an EIS for Army reuse, and the comments that were received. Many of these comments remain relevant to the current proposed action.

Scoping for this EA was resumed in the spring of 1999, as described in the following subsections, by mailing flyers to all known interested agencies and individuals on the mailing list, followed by more formal correspondence with responsible resource agencies (Appendix A).

### 1.7.2 Public Meetings

A public scoping meeting for the (now discontinued) EIS on Army reuse was held in the evening of July 14, 1997. Verbatim comments at this meeting were transcribed for the record. A summary of these comments is presented in Appendix A.

Between that time and the initiation of this EA, WRAMC personnel met informally several times with interested community groups, to update them on the NEPA process and related deliberations, and to discuss other issues of interest, such as ongoing maintenance and security concerns at the NPSHD and traffic at Forest Glen Annex.

On the evenings of May 11, 1999, and October 28, 1999, the Army held open public information meetings to discuss the decision to discontinue the EIS for Army reuse of the NPSHD and the plan for preparing this EA, and to acquaint community members with the process for excessing and disposal of federal property. These public meetings were advertised by placing notices in local newspapers and by mailing flyers to all known interested agencies and individuals on the mailing list (Appendix A).

The May 1999 public information meeting was intended to inform the community about the Army's new proposed action (declaring the NPSHD excess), to discuss the excessing and disposal process, and to discuss the change from an EIS to an EA. The October 1999 public

information meeting was intended to discuss the progress of the excessing action and the findings of this EA. Summary notes of the discussions at these public information meetings were taken and considered in preparing this EA (Appendix A).

Under NEPA regulations, public scoping meetings and public hearings to review draft documents are not required for an EA (unlike for an EIS). However, because of the high level of community interest in the NPSHD, the Army has chosen to continue meeting with the public, and with interested state, local and federal agencies, to maintain communication.

### **1.7.3 Local Agency Meetings**

Because of the strong community interest in this property, as well as the key role that local government agencies may be called upon to play in GSA's screening and disposal process (see Section 2.0), the Army has held a series of working meetings with interested local government agencies. These meetings were intended:

- To exchange information about the federal process of excessing and disposal and the local government process for site development
- To develop interagency relationships
- To keep local agencies informed about the progress being made by the Army and GSA toward excessing and transfer or disposal of the NPSHD

Local agency meetings were held during the day, to facilitate attendance by government employees, generally on the same days as the public information meetings (which were held in the evening to facilitate attendance by the general public). Summary notes of the discussions at those meetings are presented in Appendix A.

### **1.7.4 Public Review Under NEPA**

The Final EA will be made available to the public for review. Either a Finding of No Significant Impact (FNSI) or an NOI to prepare an EIS, as appropriate, will be prepared. A notice advertising the availability of the EA will be published in local newspapers and mailed to agencies and individuals on the mailing list. Copies of the EA will be available for review at the Silver Spring Library and will be provided to all who request it by writing to the point of contact designated in the public notice. If the EA results in a FNSI, the Army will not initiate the proposed action for 30 days after the completion of the EA and FNSI and public notification.

## **1.8 Relevant Statutes and Executive Orders**

The following statutes bear on disposal or reuse activities at the NPSHD. The discussion notes their relevance to the proposed action.

## 1.8.1 Resource Protection Statutes

### Clean Air Act

Under the Clean Air Act (CAA), the US Environmental Protection Agency (EPA) has established National Ambient Air Quality Standards (NAAQS). The NAAQS are time-averaged concentrations of criteria pollutants that may not be exceeded in the ambient air more than a specified number of times. The NAAQS are to be achieved through state implementation plans (SIPs), which provide limitations, schedules, and timetables for compliance with NAAQS.

Amendments to the CAA in 1990 introduced, in Section 176(c) of the act, a requirement that “No department, agency, or instrumentality of the federal government shall engage in, support in any way, or provide financial assistance for, license or permit, or approve any activity which does not conform to an implementation plan.” Conforming to a SIP means conforming to that plan’s purpose of eliminating or reducing the severity and number of violations of the NAAQS and achieving expeditious attainment of such standards. The General Conformity Rule, 40 CFR 93, which implements Section 176(c) of the CAA, requires an assessment of conformity for all applicable federal actions.

### Clean Water Act

Since major amendments in 1977, the Federal Water Pollution Control Act has been known as the Clean Water Act (CWA). This statute, which seeks to restore and maintain the chemical, physical, and biological integrity of the nation’s waters, identifies certain pollutants and sets required treatment levels for those pollutants. The CWA addresses both point-source and nonpoint-source discharges. Point sources are distinct entities that discharge wastewater with pollutants into rivers or lakes through pipes, ditches, canals, or distinct conveyances. Nonpoint sources are those, such as agricultural lands, construction sites, parking lots, or streets, that do not discharge wastewater from a discrete conveyance.

Section 402 of the CWA establishes the National Pollutant Discharge Elimination System (NPDES) program. NPDES permits are required for all point-source discharges to waters of the United States, including discharges of stormwater associated with industrial activities.

Section 404 of the CWA establishes the national regulation and protection of wetlands. Freshwater wetland permits are required for any discharge of dredged or fill material into waters of the United States. Waters of the United States are defined as including wetlands as delineated by the U.S. Army Corps of Engineers (Corps) definitions. State regulations for managing and protecting freshwater wetlands also are authorized and required under the CWA.

### Endangered Species Act

Under the Endangered Species Act, federal agencies are required to conserve species that have been listed as endangered or threatened. All federal agencies must consult with the USFWS to ensure that any action authorized, funded, or carried out by the agency is not likely to jeopardize the continued existence of any endangered or threatened species or to result in destruction or adverse modification of its critical habitat. This mechanism, deriving from Section 7 of the act, is often referred to as the consultation process. While the

consultation process is in progress, an agency is forbidden from making any irretrievable commitment of resources to its project. Consultation typically leads to the USFWS's suggestion of alternatives or mitigating measures that can be incorporated into the project, thereby allowing its completion.

### **National Historic Preservation Act**

The National Historic Preservation Act (NHPA) of 1966, as amended, requires the Army to consider the effect of any undertaking on properties included in or eligible for inclusion in the National Register of Historic Places and to give the ACHP a reasonable opportunity to comment on such undertakings, through the Section 106 consultation process established at 36 CFR Part 800. These Section 106 regulations, which were revised in May 1999, also provide the means for determining whether a particular undertaking or action might have an adverse effect on historic properties. The process of consulting with the SHPO, the ACHP, and with other identified consulting parties as appropriate, can be used to resolve adverse effects on historic properties by developing a Memorandum of Agreement or a Programmatic Agreement.

## **1.8.2 Waste Management and Cleanup Statutes**

### **Comprehensive Environmental Response, Compensation, and Liability Act**

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, also known as Superfund, addresses the remediation of past hazardous substance sites that pose threats to human health or the environment. The Superfund Amendments and Reauthorization Act of 1986 (SARA) expanded the procedures for remediation at federal facilities.

Procedures for conducting cleanup are governed by the National Oil and Hazardous Substances Pollution Contingency Plan. Compliance with the National Oil and Hazardous Substances Pollution Contingency Plan at Army facilities occurs through the Department of Defense's (DOD) Installation Restoration (IR) Program. The IR Program addresses hazardous waste sites requiring remediation.

At facilities where remediation is required, the major steps in the cleanup process include preliminary assessment and site investigation of areas where hazardous substances were released or disposed of; remedial investigation and preparation of feasibility studies for cleanup; a record of decision for selecting cleanup measures; design of remedial measures; and implementation or remedial action. The process includes creating and maintaining an administrative record for public review and providing notices to the public for review and comment at major junctures.

### **Resource Conservation and Recovery Act**

Under the Resource Conservation and Recovery Act (RCRA), the EPA defines those wastes that are hazardous and regulates their generation, treatment, storage, transportation, and disposal. The EPA also establishes technical and performance requirements for hazardous waste management units and exercises responsibility over a permit system for hazardous

waste management facilities. RCRA also is the source for regulations pertaining to solid waste management and underground storage tank management.

### **1.8.3 Property Transfer Statutes**

#### **Federal Property and Administrative Services Act of 1949**

The Federal Property and Administrative Services Act of 1949 (FPASA), Public Law (PL) 81-152, established the GSA and gives that agency the overall responsibility for acquiring and using federally owned and leased office buildings and space, for determining when real property is surplus to the needs of the federal government, and for disposal of surplus federally owned property.

Under Section 203(k)(1), for example, GSA can assign surplus real property to the Secretaries of Education and of Health and Human Services (HHS), as appropriate, for disposal when needed for school, classroom, or other educational uses, or for use in the protection of public health, including research and homeless assistance purposes. Under Section 203(k)(2), GSA can assign surplus property to the Secretary of the Interior for disposal when it is needed for use as a public park or recreation area. Under Section 203(k)(3), GSA can convey to any state, political subdivision, or municipality, any surplus real and related personal property that (as determined by the Secretary of the Interior) is suitable and desirable for use as a historic monument for the benefit of the public. Other provisions of the FPASA govern the process for assigning property for other public benefit purposes and for conveying property to the public or private sector (GSA, Office of Property Disposal, 1999).

#### **McKinney Act**

Under the Stewart B. McKinney Homeless Assistance Act (PL 100-77), more commonly known as the McKinney Act, the US government recognizes its responsibility to use public resources and programs in a more coordinated manner to meet the critically urgent needs of the homeless. The McKinney Act provides a process for screening surplus government property for use by providers of assistance to the homeless (see Section 2.2).

Title V of the McKinney Act expands the meaning of Section 203(k)(1) of the FPASA to include facilities to help the homeless as a permissible use in protecting public health. The Secretary of Housing and Urban Development (HUD) collects data on federal properties and identifies those suitable to assist the homeless. GSA and HHS make suitable surplus properties available to private nonprofit organizations, local governments, and states for use as facilities to help the homeless. These properties are leased, deeded, or made available on an interim basis at no cost to approved homeless-assistance providers. Federal land-holding agencies may lease or permit suitable underutilized property to approved homeless-assistance applicants (GSA, Office of Property Disposal, 1999).

### **1.8.4 Executive Orders**

The following executive orders address topics that may be relevant to the proposed action and alternatives:

*Executive Order 11988*, “Floodplain Management” (May 24, 1977), requires federal agencies to take action to reduce the risk of flood loss; to minimize the impact of floods on human safety, health, and welfare; and to restore and preserve the national and beneficial values served by floodplains in carrying out their responsibilities for, among other actions, managing and disposing of federal lands. Before taking an action, an agency must determine whether the proposed action will occur in a floodplain. If an action will be located in a floodplain, consideration must be given to alternatives for avoiding adverse effects and incompatible development in floodplains.

*Executive Order 11990*, “Protection of Wetlands” (May 24, 1977), requires federal agencies to take action to minimize the destruction, loss, or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency’s responsibilities for, among other things, managing and disposing of federal lands and facilities. For any proposal for lease, easement, right-of-way, or disposal to non-federal public or private parties, the federal agency shall (a) reference in the conveyance those uses that are restricted under federal, state, or local wetland regulations; and (b) attach other appropriate restrictions to the uses of properties by the grantee or purchaser and any successor, except where prohibited by law; or (c) withhold such properties from disposal.

*Executive Order 12088*, “Federal Compliance with Pollution Control Standards” (October 13, 1978), provides that federal agencies are to comply with all federal, state, and local environmental requirements. In the context of excessing, these requirements will continue so long as the Army retains any indicia of ownership of the property or interim use of the property.

*Executive Order 12898*, “Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations” (February 11, 1994), requires that federal agencies conduct their programs, policies, and activities that substantially affect human health or the environment so that persons (including populations) are not excluded from participating in, denied the benefits of, or subjected to discrimination under such programs, policies, and activities, because of their race, color, or national origin.

*Executive Order 13045*, “Protection of Children from Environmental Health Risks and Safety Risks” (April 21, 1997), recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health and safety risks. The executive order requires federal agencies, to the extent permitted by law and mission, to identify and assess such environmental health and safety risks and to ensure that such programs, policies, and activities address disproportionate risks to children that result from environmental health risks or safety risks.



## 2. Description of Proposed Action

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### 2.1 Introduction

The proposed action evaluated by this EA is to report the NPSHD in its entirety as an excess property, by forwarding a “Report of Excess Real Property” to the GSA (Appendix B). Doing so will initiate the GSA’s process of screening, marketing, and ultimately disposing of the property.

This section summarizes the events leading to this proposed action and how it will be implemented, including the subsequent GSA actions that will lead to transfer or disposal of the property to a new owner. The alternatives that have been identified for the proposed action are described in Section 3, “Alternatives.”

#### 2.1.1 WRAMC Mission

The Walter Reed Army Medical Center is a major medical care, research, and teaching center of international importance, under the command jurisdiction of the US Army Medical Command (MEDCOM), Fort Sam Houston, Texas. WRAMC is the Army’s largest health care facility and one of the largest in DOD. More than a million patients a year visit the hospital at WRAMC’s Main Section and its two satellite clinics.

WRAMC’s mission is to:

- Provide quality, comprehensive health care that is cost-competitive and accessible.
- Serve as a national resource for specialty care and medical issues unique in DOD and other federal agencies.
- Maintain individual and collective readiness in support of the DOD health care system.
- Provide research, education and training in support of the DOD health care system.

WRAMC is the home of the North Atlantic Regional Medical Command (NARMC), one of MEDCOM’s five US regional commands. NARMC includes 21 states and the District of Columbia and provides leadership, planning, and support for the 50 Army hospitals and clinics in the region.

WRAMC also hosts 17 tenant organizations. The largest tenant is the Walter Reed Army Institute of Research (WRAIR), the largest military medical research laboratory in DOD. Another major tenant at WRAMC is the Armed Forces Institute of Pathology (AFIP), a tri-service organization that teaches pathology to hundreds of military and civilian physicians each year (WRAMC, 1998b).

WRAMC consists of three geographically separate areas (see Figure 1-1). The Main Section, near the northern border of the District of Columbia, contains the hospital and major research and teaching facilities. The Forest Glen Annex in Montgomery County provides

service, support, and research facilities. The Glen Haven Section, in Montgomery County about 4 miles north of the Main Section, provides family housing for enlisted military personnel assigned to WRAMC.

### 2.1.2 Description of Affected Property

The NPSHD is an approximately 27-acre parcel of land with 29 buildings, 24 of which are historic. The parcel is located on the north end of the Forest Glen Annex and is generally bounded by the Capital Beltway (I-495) on the north, Smith Drive on the east, and Linden Lane and the neighborhood of Forest Glen Park on the south and west. Four of the NPSHD's buildings (112, 115, 126, and 133) are located south of Linden Lane (Figure 2-1). As Figure 2-1 shows, there are three other historic buildings nearby that are not located within the boundary of the NPSHD parcel.

The NPSHD is composed of a collection of late 19<sup>th</sup> and early 20<sup>th</sup> century architecturally eclectic buildings and structures that surround a wooded stream ravine, referred to as "the Glen." The first building on the site, "Ye Forest Inne" (Building 101a, later known as simply as "The Main") was constructed by a land development company and was operated as a hotel and gambling casino.

A private finishing school for women, called the National Park Seminary and later the National Park College, was established on the site in 1894. The school sought to provide a physical environment that was beautiful, unique, and edifying as part of its educational philosophy. The eclectic architecture of the buildings is a reflection of that philosophy.

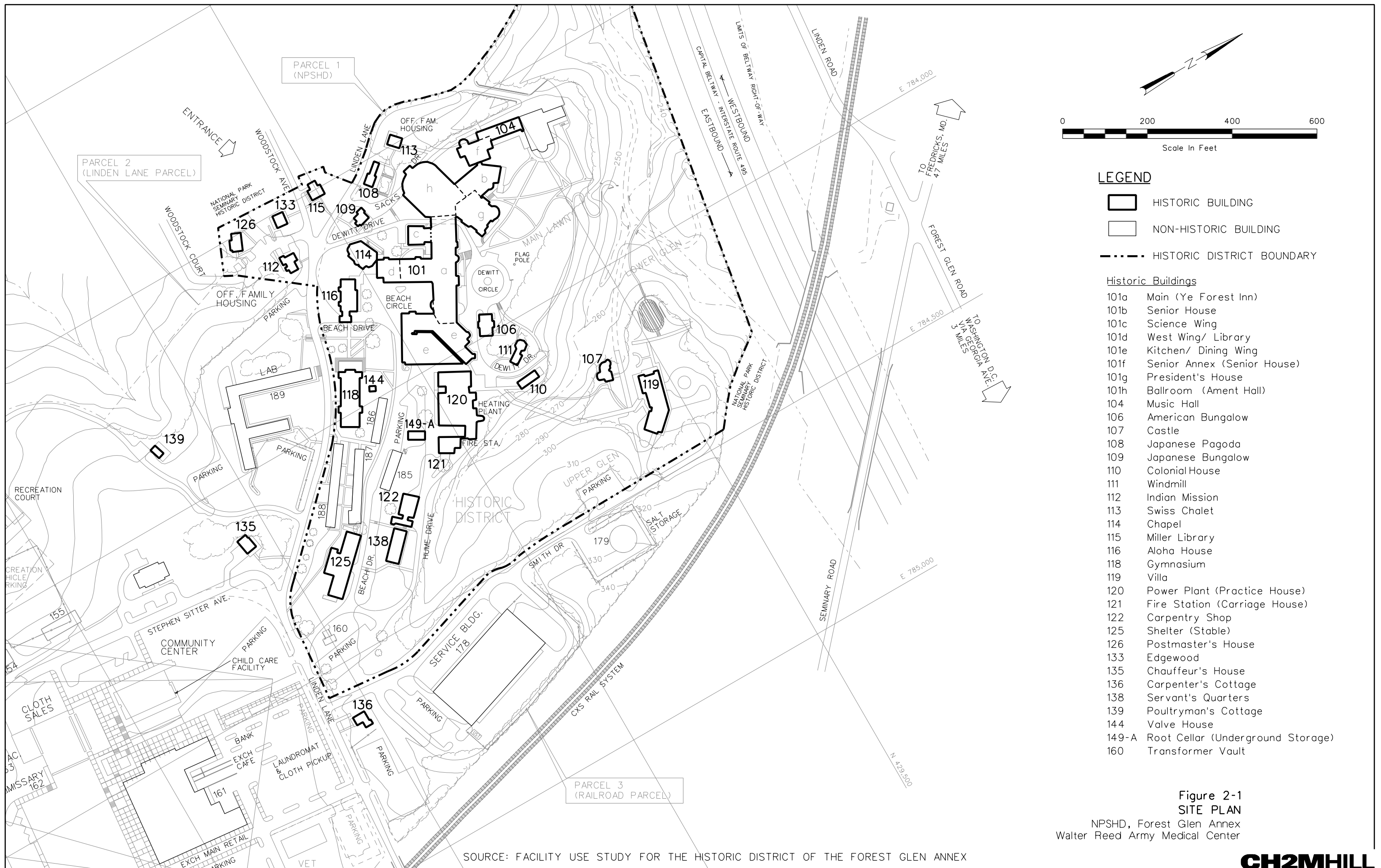
The Army acquired the property in 1942, during World War II, and used it as a convalescent center through the Vietnam War period. Convalescent wards in the historic buildings were closed in 1972 (KFS, 1992). Since that time, buildings in the NPSHD have seen limited use for administrative and logistical support, such as offices, storage, and military housing.

Over time, WRAMC's mission-related activities and tenants that were located in the NPSHD have been relocated to other, more suitable facilities at the Forest Glen Annex or the Main Section. The Forest Glen Fire Station is one of the few NPSHD buildings still in active use. Most of the buildings in the NPSHD are now vacant.

The NPSHD was listed on the National Register of Historic Places in 1972. In 1979, the NPSHD became the first historic district to be designated by Montgomery County and is listed on the county's *Master Plan for Historic Preservation*.

The unique buildings and wooded glen that make up the NPSHD are an important historic, architectural, cultural, and open space resource for the North and West Silver Spring area and Montgomery County.

The historic district also is a prominent, established feature of the adjacent off-post residential community of Forest Glen Park, which is bounded on the east by the NPSHD, on the west by Rock Creek Park, on the north by I-495, and on the south by the rest of the Forest Glen Annex (see Figure 1-1).



### 2.1.3 Maintenance of the NPSHD Property

The age and architectural complexity of the NPSHD buildings have presented unique maintenance problems that cannot be—and have not been—adequately addressed within the limited budget and maintenance staff available to WRAMC. The buildings were constructed with wooden wall and roof structures, wooden shingle sidings or pebble-dash stucco (applied over the original wood) on the exterior walls, and asphalt or asbestos shingled roofs. These materials have long out-lived their normally expected service life.

As a result, although WRAMC has spent an average of \$100,000 per year historically, with an increase to \$200,000 in fiscal year (FY) 1998 for maintenance and repair of the NPSHD buildings, most of the historic structures are in poor or deteriorated condition and several are seriously unstable (Higginbotham/Briggs & Associates, et al., 1996).

Currently, the Army is applying \$400,000 per year from MEDCOM's baseline funding for routine maintenance and repair in the NPSHD.

#### 2.1.3.1 Comprehensive Plan for Basic Repair and Stabilization

Under the 1997 Defense Authorization Act, the Army was directed to develop a programming document, the *Comprehensive Plan for Basic Repair and Stabilization for the Historic District of the Forest Glen Annex* (Higginbotham/Briggs & Associates, et al., 1997c). This report identified and estimated costs for short-term measures that were the most urgently needed for basic repair and stabilization of buildings located in the NPSHD. The initial cost to implement these measures was estimated to be approximately \$17 million or about \$36.2 million in life-cycle costs (Higginbotham/Briggs & Associates, et al., 1998). For the purpose of this document, work was projected to begin in FY 1998; the estimated costs were projected to rise if implementation of these measures was delayed past FY 1999.

In the fall of 1997, a prioritized list of stabilization projects was extracted from the Comprehensive Plan. In FY 1998, the Army budgeted \$1,000,000 for work to be performed in the NPSHD. Of that amount, approximately \$200,000 was dedicated to annual maintenance and repair activities and \$800,000 was committed for repair and stabilization projects. During the design phase, it became apparent that many of the stabilization projects identified in the Comprehensive Plan are actually more costly to construct than was estimated in that study.

After consultation with the Maryland Historical Trust and the Advisory Council on Historic Preservation, these projects were initiated in the winter of 1998-1999 (see Table 2-1).

As previously noted, the Army is spending \$400,000 annually for routine repair and maintenance activities in the NPSHD. Without special legislation, additional funding for any future stabilization projects is not anticipated.

#### 2.1.3.2 Military Housing Repairs

In 1998, WRAMC sought additional funding through the Army Family Housing program for repairs to the four NPSHD houses located south of Linden Lane (Buildings 112, 115, 126, and 133), to allow them to be used again as military family housing units. This effort was undertaken in response to concerns expressed by nearby offpost residents of Forest Glen

Park about these buildings (which are next to several private residences) remaining vacant. However, the requested funding was denied.

Current DOD policy requires installations to begin privatizing military family housing, not to acquire or upgrade housing units within the military system. Also, in addition to the necessary structural and infrastructure repairs, these buildings are not currently suitable for family housing due to the presence and condition of lead-based paint and asbestos. Residents were moved out of the last occupied family housing unit, Building 126, in March 1999. These buildings are now expected to remain boarded up until the NPSHD is transferred to a new owner.

TABLE 2-1  
1998-99 STABILIZATION PROJECTS

Building	Project	Cost
Building 101	Roof repairs	\$86,141
Building 101	Exterior painting	\$157,120
Building 101h (Ballroom)	Exterior painting	\$41,273
Buildings 101 and 104 (Music Hall)	Stucco repair/replacement	\$100,463
Buildings 101 and 104 (Music Hall)	Paint metal roofs	\$83,710
Building 104 (Music Hall)	Exterior painting	\$37,768
Building 114 (Chapel)	Replace roof	\$48,686
Building 120 (Power Plant)	Replace roof	\$125,200
Building 120 (Power Plant)	Exterior painting	\$44,275
Buildings 120 (Power Plant) and 121 (Fire Station)	Window repair and replacement (to match existing windows)	\$22,941
Building 114 (Chapel)	Exterior painting	\$25,490
Building 108 (Pagoda)	Abate lead-based paint	\$25,498

Source: MEDCOM, March 1999

### 2.1.3.3 Cooperative Agreement for Volunteer Repair Work

In January 1998, WRAMC entered into a Cooperative Agreement with Save Our Seminary (SOS) for the exterior restoration of buildings at the NPSHD. SOS is a local nonprofit organization dedicated to preserving and increasing public awareness of the NPSHD. Its activities include publishing a newsletter and leading walking tours of the site.

The Cooperative Agreement was developed to provide additional maintenance for the NPSHD, recognizing the limited funding available to WRAMC for restoration and the resources available through dedicated volunteers, and to coordinate volunteer efforts with work being funded by the Army. Under the agreement, WRAMC provides equipment and materials, as available, for painting and other exterior maintenance, and SOS provides planning, coordination of volunteer labor, and materials obtained from other sources.

SOS has been raising funds to restore the exterior of the Japanese Pagoda, beginning with grants from nonprofit agencies such as Preservation Maryland and the National Historical Trust, donations from members, and assistance from local businesses. Restoration will include returning the Pagoda to its original paint colors of red with black and yellow trim. In preparation for this volunteer effort, WRAMC has removed the existing lead-based paint from the Pagoda.

#### 2.1.4 Litigation

The Department of the Army was involved in a lawsuit concerning the NPSHD, filed by the National Trust on Historic Preservation and SOS. The suit was filed on May 18, 1994, in US District Court. The suit claimed that WRAMC had knowingly allowed deterioration of historic properties in violation of Section 110 of the National Historic Preservation Act of 1966. The remedy sought by the plaintiffs was to order immediate repair and stabilization of the NPSHD necessary to “arrest the deterioration and continued threats to the properties and correct the effects of past neglect” (*National Trust on Historic Preservation et al. v. Major General Ronald L. Blanck et al.*, No. 94-1091 PLF).

On September 13, 1996, the US District Court ruled in favor of the Army and granted the Army’s motion for summary judgment. The Court’s opinion found that the Army had been in violation of Sections 106 and 110 of the NHPA over a period of 8 years, but that the Army has been in compliance with Sections 106 and 110 since 1992. The Court concluded that the Army’s course of conduct since 1992 was permissible under the NHPA and the Court found no basis in law on which to require the Army to invest any more funds in the District.

On June 8, 1999, the plaintiffs filed a motion to appeal the District Court’s decision to the Court of Appeals for the District of Columbia. The appeal is pending.

#### 2.1.5 Previous Reuse Planning Efforts

##### 2.1.5.1 Forest Glen Task Force and Feasibility Study

In 1972, in anticipation of the closing of the Medical Center, which at that time was located in the NPSHD, the NCPC and Montgomery County appointed the Forest Glen Task Force (including a WRAMC representative) to identify landmarks of cultural and historical importance in the NPSHD and to assist WRAMC in identifying future uses for the NPSHD. The nomination of the NPSHD to the National Register was accomplished under the auspices of the Task Force.

In 1973, the *Feasibility Study, National Park Seminary Site Preservation*, which identified priorities for preservation, was prepared by a consultant to the Forest Glen Task Force and Montgomery County Planning Board. The study recommended preserving the open character of the “Glen,” retaining the buildings constructed before 1912, including the Inn and all eight sorority houses, and demolishing several other buildings—including the Ballroom—in order to restore the original relationship of the site and the oldest buildings (Keyes, Lethbridge, and Condon, 1973). The recommendations to demolish selected historic buildings were subsequently rejected by the Task Force.

When approached by the Task Force, a number of organizations (including the National Park Service, Corcoran Gallery of Art, Smithsonian Institution, Woodrow Wilson Center for International Scholars, University of Maryland, Montgomery College, and the Maryland Institute of Art) all declined interest in acquiring the property. Representatives of the National Park Service (NPS) stated that NPS would be interested only in acquiring sites of national historic significance, whereas the NPSHD was considered to be of local significance only (M-NCPPC, 1973a).

By the end of the Task Force's work in 1973, the only entity identified as having an interest in taking over the property, if it were declared excess after completion of the new Main Section hospital in 1977, was the M-NCPPC Park Department (M-NCPPC, 1973b).

Around that time, and since, several outside organizations contacted WRAMC to request tours of the property or otherwise express potential interest in acquiring the property, for uses such as a hospice or an art center. However, no serious overtures were received (Smith, personal communication, April 12, 1999).

In 1977, an M-NCPPC staff review of WRAMC's Forest Glen Master Plan commented that "The Task Force realizes that ultimate use [of the NPSHD] cannot be determined at present... [and that] perhaps the best solution would be for WRAMC to retain ownership of the Historic District."

In a July 6, 1979, memorandum to the U.S. Army Health Services Command (predecessor agency to MEDCOM), WRAMC took exception to a GSA recommendation to declare the NPSHD excess. At that time, according to the memo, WRAMC was unable to state whether or not, or when, the NPSHD property should be reported excess. The memo acknowledged that WRAMC had no long-term requirement for the facilities in the NPSHD, except for some administrative functions and family housing. However, the memo stated that excessing the property at that time would adversely affect the Military Construction Program, which used the property as a staging area; tenant organizations that were using the facilities; and WRAMC's Mobilization/Emergency Expansion mission, which might need to use the former patient wards and related spaces in the event of a national emergency, such as another war (Goriup, 1979).

#### **2.1.5.2 Adaptive Reuse Study**

In 1991, WRAMC recommended that the NPSHD property was excess to its needs and forwarded that recommendation to the U.S. Army Health Services Command. WRAMC's 1992 Forest Glen Master Plan incorporated that recommendation. As a result, no new construction or renovation projects were proposed for the NPSHD in the 1992 Forest Glen Master Plan. However, a formal report of excess property was not made at that time.

In 1994, in anticipation of the property being declared excess, the Army in cooperation with Montgomery County and M-NCPPC initiated an adaptive reuse planning study. The purpose of the study was to develop alternative concepts for reuse of the NPSHD by private- or public-sector parties other than the Army. The study was jointly funded by the Army under the Legacy program (89 percent) and by Montgomery County (11 percent). The Legacy Program, created by the 1991 Defense Appropriations Act, provided funding for a

variety of demonstration projects that were designed to explore new and improved ways of protecting natural and cultural resources at military installations.

The study team consulted with a Technical Advisory Committee composed of representatives from interested parties, including Montgomery County, the National Trust on Historic Preservation, SOS, the Maryland Historical Trust, M-NCPPC, and the Forest Glen Park Citizens Association. Three public forums were held to solicit public input on potential uses for the NPSHD. The *Forest Glen Adaptive Reuse Study* was completed in 1995.

The study examined existing conditions (physical, economic, and regulatory), identified potential reuses, developed preferred development concepts, and evaluated the financial feasibility of the development concepts. Each concept included architectural, historical, transportation, engineering, environmental, master planning, and economic analyses.

Three development concepts were found to be the most viable and acceptable to the various interested parties: the Residential concept, the Retirement Community concept, and the Institutional concept (or some combination of the three).

However, economic analysis of these three preferred development concepts predicted a substantial financial deficit for any prospective developer, because the project would cost more to develop than it would be worth to the developer when completed. The estimated financial gap ranged from \$5.3 million for the Institutional concept to \$25.6 million for the Retirement Community concept (due to the more extensive renovations required for use by elderly residents).

To evaluate the potential for closing this financial gap, a fourth (Residential-Expanded) development concept was added that included an additional 11 acres (approximately) of land at Forest Glen Annex: a 6-acre parcel to the east of the NPSHD, next to the CSX railroad tracks; a 4-acre parcel south of Linden Lane that included Buildings 189, 135, and 139; and a 1-acre parcel consisting of the four houses (Buildings 115, 133, 112, and 126) located south of Linden Lane at the intersection of Woodstock Court and Woodstock Avenue (at that time, those four houses were not being considered for excessing along with the rest of the NPSHD).

The study found that these additional parcels would add value to the project, in the form of developable land without the cost of restoring historic buildings. Nonetheless, evaluation of the fourth Residential-Expanded concept, including the additional 11 acres, showed a remaining financial gap of \$12.3 million between total sales and total development cost. The report identified potential sources of additional public funding that might be used to fill that gap and recommended establishing a redevelopment entity to oversee and facilitate the process (EDAW, et al., 1995).

#### 2.1.5.3 Environmental Baseline Study

In 1995, in anticipation of the property being declared excess and ultimately transferred to new owners, the Army initiated the *Environmental Baseline Study for the Historic District of the Forest Glen Annex* (CH2M HILL, 1996), which covered the NPSHD and the same additional parcels that were considered in the Adaptive Reuse Study.



An Environmental Baseline Study (EBS) is a preliminary study that is conducted, by reviewing existing information and visually inspecting the site, to determine the potential presence of hazardous substances on the property under conditions that indicate a potential past, current, or future release. According to AR 200-1, "Environmental Protection and Enhancement," it is Army policy to prepare an EBS for properties being considered for acquisition, outgrants, or disposals, to identify the potential environmental contamination liabilities that may be associated with the real property transactions, and to support preparation of a Finding of Suitability to Transfer (FOST), Finding of Suitability to Lease (FOSL) or an Environmental Condition of Property (ECOP). The results of the EBS and subsequent related studies are described in subsection 4.9 of this EA, "Hazardous and Toxic Materials."

#### 2.1.5.4 Facility Use Study

In 1996, the Department of the Army recommended that retaining the real property comprising the Forest Glen Annex in its entirety, including the NPSHD, might be required to meet future mission requirements. That recommendation was based both on the outcome of the 1995 *Forest Glen Adaptive Reuse Study* (which predicted a financial deficit for prospective developers) and on the anticipation that base realignment or other DOD directives might result in new or expanded missions being assigned to WRAMC. Outside of the Forest Glen Annex, WRAMC has limited areas of developable land available to accommodate future mission-related activities.

Accordingly, the Army initiated a comprehensive facility study at the NPSHD, to more thoroughly document the current condition of the historic structures and site and to assess the feasibility of Army reuse of the NPSHD site and buildings. The study resulted in four reports, collectively referred to as the Facility Use Study:

- *Facility Condition Assessment for the Historic District of the Forest Glen Annex*, Volumes I and II, October 1996 (Higginbotham/Briggs & Associates, et al., 1996).
- *Site Condition Assessment for the Historic District of the Forest Glen Annex*, February 1997 (Higginbotham/Briggs & Associates, et al., 1997a).
- *Preliminary Facility Use Study, Historic District of the Forest Glen Annex—Walter Reed Army Medical Center*, February 1997 (Higginbotham/Briggs & Associates, et al., 1997b).
- *Economic Feasibility Study for Facility Reuse, Historic District of the Forest Glen Annex—Walter Reed Army Medical Center*, December 1998 (Higginbotham/Briggs & Associates, et al. 1998).

The *Facility Condition Assessment for the Historic District of the Forest Glen Annex* (FCA) documented the architectural features; physical conditions; and structural, mechanical, and electrical components and systems of the historic buildings. It was intended to help WRAMC determine rehabilitation measures and develop reuse alternatives. Information in existing studies was consolidated with the findings of field surveys and onsite observation. For the purposes of the Facility Use Study, the large central building called "The Main" was subdivided into eight parts (Buildings 101a through 101h—see Figure 2-1). The study also included three historic buildings located outside the NPSHD (Buildings 135, 136, and 139).

The 1950s-era laboratory buildings in and next to the NPSHD (Buildings 186, 187, 188, and 189) were not evaluated, because they are non-historic and because they are planned for eventual demolition if the Army retains the NPSHD property. Building 189 is already programmed for demolition as part of the new WRAIR building project.

The FCA found most of the NPSHD buildings to be in poor or deteriorated condition and several buildings to be seriously unstable. The buildings are mostly wood-framed, with wood floors and walls. Many have suffered water damage and wood rot from roof leaks and moisture intruding through cracks in the buildings' aging pebble-dash stucco coating. The facility assessment also found deterioration and risk of further damage from poor stormwater drainage at the base of buildings and from "problem" trees, which had been planted too close to buildings and now seriously threaten their foundations. Most of the buildings' heating, plumbing, and electrical systems have outlived their service life and need to be replaced.

The *Site Condition Assessment for the Historic District of the Forest Glen Annex*, prepared as a companion study to the FCA, documented the condition of site elements within the NPSHD including storm drainage, significant man-made and natural land features, trees, historic features (sculptures, bridges, and walkways), and site utilities (sanitary sewer, water, steam, gas, and electric). The report recommended improvements that would be necessary to reuse the site.

The *Preliminary Facility Use Study, Historic District of the Forest Glen Annex* (PFUS) built upon the previous two studies, to rate the suitability of the historic buildings for adaptive reuse and to develop a facility rehabilitation scenario for the NPSHD as a medical administration and conference center. The report evaluated the suitability of each building for conversion to each of three uses (administrative, conference, and physical fitness), recommended alterations (including selective demolition), and proposed a single reuse scenario. The primary criteria were compliance with life-safety and building codes and efficient use of the existing building space. The study included a building-by-building analysis of how useable space could be created in each building, to fit the proposed reuse.

The *Economic Feasibility Study for Facility Reuse* took the findings of the three previous studies, generated four reuse scenarios for Army reuse of the NPSHD, as variations on the single scenario developed in the PFUS, detailed the building and site work that would be needed for each scenario, and provided an economic analysis of each scenario that included both capital improvements and a life-cycle cost analysis over a 10-year period.

Cost estimates ranged as follows:

- **Scenario 1** (status quo with Comprehensive Plan's repair and stabilization measures): \$17 million in initial costs or \$36.2 million in life-cycle costs
- **Scenario 2** (complete renovation): \$85.9 million in initial costs or \$219.8 million in life-cycle costs
- **Scenario 3** (PFUS scenario with nine buildings demolished to meet building codes and all other buildings renovated): \$76.4 million in initial costs or \$90.9 million in life-cycle costs

- **Scenario 4** (all sections of Main/Building 101 renovated, all other buildings demolished): \$59.1 million in initial costs or \$66.6 million in life-cycle costs

Since this study was completed, the Department of the Army has determined that WRAMC does not have a current or any foreseeable future need for the NPSHD and that, even if a mission were identified, the property could not be economically adapted for Army use, due to the deteriorated state of the buildings and the historical significance attached to the buildings by the local community. Accordingly, none of the scenarios proposed by the Facility Use Study are under consideration as feasible Army options for the NPSHD (see subsection 3.3).

## 2.2 Implementation of the Proposed Action

Under the proposed action, the NPSHD property will be declared excess to Army needs and can then be leased, transferred, or sold in its entirety to another party or parties, which could include another federal agency or other public or private-sector parties, for reuse.

The process for disposal of surplus government property is governed by the Federal Property and Administrative Services Act of 1949, as amended; the Stewart B. McKinney Act; and other applicable laws and regulations—specifically, the Federal Property Management Regulations (FPMR), at Title 41 CFR Part 101-47 “Utilization and Disposal of Real Property” and AR 405-90 “Disposal of Real Estate.”

The following subsections describe how the excessing and disposal process will be implemented for the NPSHD.

As described in the following subsections, the Army’s involvement in this prescribed process is essentially limited to preparing the “Report of Excess Real Property” and screening the property for potential future use within DOD. Subsequent actions in the disposal process are the responsibility of GSA. Those actions are described here because they are secondary actions that will be initiated by the Army’s primary action of declaring the property excess, because the Army will retain certain responsibilities during the disposal process, and in order to provide readers of this EA with an understanding of the process as a whole.

### 2.2.1 Army Action: Report of Excess Real Property

The first step in the process is for the Army to complete GSA’s Standard Form (SF) 118, “Report of Excess Real Property” (see Appendix B). The SF-118 documents the buildings, space, land, cost to the government, rental income (if any), present use, and range of possible future uses associated with the property in question. The Army will provide GSA with title work and the status of existing easements, environmental studies (including the 1996 EBS and this EA), cultural resource studies, and other information to support the “Report of Excess Real Property.”

Once a property is reported for excess, it still may be used by the Army until transfer of the property to a new owner is completed. Under the FPMR (41 CFR 101.402-1) and AR 405-90, the Army as the “holding agency” retains custody and accountability for excess real

property and is responsible for the protection and maintenance of such property, pending its transfer to another federal agency or its disposal to a non-federal entity. After GSA receives the "Report of Excess Real Property," a Memorandum of Agreement (MOA) will be negotiated between the Army and GSA to document the duration and level of maintenance that each agency will be responsible for. (See the following subsection "Interim Maintenance of Property Until Disposal.")

### 2.2.1.1 Replacement of the Fire Station

If the property is successfully transferred to a new owner, the Fire Station that is located in the NPSHD (Building 121) will need to be replaced with a new facility. The Army has begun the process of planning and programming a new Fire Station, to be located near Brookville Road, at the southern boundary of the Forest Glen Annex. This project was previously approved in the 1992 Master Plan for Forest Glen and the environmental impacts of constructing a new fire station project were evaluated in an EA that was prepared for the 1992 Master Plan (RGH, 1990). A DD Form 1391 for the new fire station has been completed by WRAMC and coordinated with MEDCOM. Construction of the new fire station has been programmed in the FY 2001 budget for Military Construction Activity (MCA) funding (Porter, personal communication, 10/6/99). Additional NEPA documentation for this project will be completed<sup>1</sup> before the NPSHD is transferred to a new owner.

If the NPSHD is ready for transfer or disposal to a new owner before the new facility can be completed, WRAMC's Fire Department plans to lease back the current Forest Glen Fire Station building from its new owner for a limited time (Kidwell, personal communication, 5/27/99).

## 2.2.2 Disposal Process

Numerous factors contribute to decisions about disposal of real property owned by federal agencies. The Army and GSA must abide by laws and regulations regarding transfer of federal property. Among those requirements is a formal screening process to determine whether other DOD agencies, other federal agencies, or homeless assistance providers have a need for the property.

### 2.2.2.1 Screening Process

The method of disposal is determined, in part, by a four-part screening process as detailed in 41 CFR 101 Subpart 47.49 ("Excess and Surplus Federal Real Property"):

- **DOD Screening.** The first step in the disposal process is for the Army to screen the property with other DOD agencies and entities (including the Coast Guard) that may have a use for the structures or the property. If no military requirements exist for the property, the Army will file the "Report of Excess Real Property." The property is thereby reported to the GSA for further screening.

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<sup>1</sup> Anticipated to be completed in FY 2000

- **Federal Agency Screening.** In the second step, the GSA will offer the property to other federal agencies. At this stage, GSA also will submit a checklist to the Department of Housing and Urban Development (HUD) for a determination of the property's suitability for homeless assistance (see following bullet). If no federal agencies express interest in the property, GSA will declare the NPSHD to be surplus to the needs of the federal government.
- **Homeless Assistance Screening.** The third step in the process is to screen the property for use by providers of services to the homeless, pursuant to the Stewart B. McKinney Homeless Assistance Act (McKinney Act), as detailed in 41 CFR 101 Subpart 47.9 ("Use of Federal Real Property To Assist the Homeless"). After receiving GSA's checklist, HUD publishes suitability and availability determinations in the *Federal Register*, on a quarterly basis. Each time the names of suitable or available property are published in the *Federal Register*, a 60-day holding period is triggered for homeless assistance providers to express interest in the property. During these holding periods, the property is not available for any other purpose.
- **Public Body Screening.** The fourth step, conducted concurrently with homeless assistance screening, is to notify state and local governments—including federally recognized Native American tribes—that surplus federal real property is available and that they may be eligible to acquire it under certain laws. GSA's public involvement process begins at this stage, primarily through local governments. At the request of a state or local governmental entity, certain federal agencies, such as the Department of Interior (DOI) or Health and Human Services (HHS), can recommend that the property be used for a specific public benefit purpose (see "Public Benefit Discount Conveyance," following). Upon notification, a public agency or institution has 20 days to advise GSA's regional office of its interest in the property; the response should cite the applicable legislation and indicate how much time is needed to prepare and submit a formal application. A public body with a qualifying interest may choose to work with a nonprofit entity to prepare an application. If no state or local requirement exists, the GSA will make the property available for sale to the general public.

#### 2.2.2.2 Disposal Methods

As a result of screening, one of the following methods could be used to dispose of the NPSHD:

- **Transfer to Another Federal Agency.** If another DOD or federal agency is interested in the property, administrative or jurisdictional control will be transferred directly to that agency.
- **Public Benefit Discount Conveyance.** State or local government entities may obtain property at less than fair market value when they apply to and are sponsored by a federal agency, such as DOI or HHS, for specific beneficial uses, including public education, parks and recreation, historic monuments, wildlife conservation, or public health. When the property is to be used for these public benefit purposes, discounts of up to 100 percent may be available to eligible state and local recipients.

- **Negotiated Sale.** Property may be sold by negotiation to state or local governments at fair market value. This method is used when the proposed use by a public entity does not meet the specific criteria required for a public benefit discount conveyance (for example, a local government wishes to use a surplus federal building for an administrative office).
- **Public Sale.** A property goes to public sale only when there is no federal use for the property and it is not a candidate for negotiated sale or public benefit conveyance. GSA will advertise the property extensively and will make the property available to potentially interested parties for viewing. Public sale (to private-sector parties, nonprofit organizations or government agencies) will be conducted by sealed bid, live auction, or auction by mail or fax, through an invitation for bids.

### 2.2.2.3 Deed Restrictions

To ensure that important natural and cultural resources are protected by all future owners, necessary deed conditions and restrictions may be incorporated into deeds or other land-transfer documents. These conditions could include public or private utility easements and special conservation easements to protect significant natural resource areas such as wetlands, floodplains, and critical wildlife habitat areas or significant historic properties. Also, easements may be required to allow continued access to the property for maintenance or replacement of utilities or for long-term environmental cleanup activities (such as monitoring or operation and maintenance of a pump-and-treat groundwater remedy).

Because GSA is the property disposal agent, any specific deed restrictions deemed necessary for the NPSHD will be determined by GSA. Before the NPSHD property is disposed of to a non-federal entity, representatives of the GSA, the Army, the Maryland SHPO, and the ACHP, along with any non-signatory consulting parties identified by GSA, will work to achieve an agreement that will document appropriate management requirements, such as preservation covenants, easements, or other treatment measures for the significant historic properties on the NPSHD. The agreed-upon requirements will be included in the property transfer documents. If the GSA is unable to find a buyer for the property with these requirements in force, GSA will request that the agreement be renegotiated to modify them as necessary.

### 2.2.2.4 Parcelization

The NPSHD could be disposed of in its entirety, or it could be disposed of by parcels, with individual lots and buildings disposed of separately to different owners. Parcelization is possible at the NPSHD. However, because the property is an historic district, and also because selling the most easily reused portions of the property separately could make it more difficult to sell the remainder, the GSA will try first to dispose of the property in its entirety.

## 2.2.3 Contaminated Site Cleanup

Section 120(h)(3)(B)(1) of CERCLA requires that, in the case of real property owned by the United States on which hazardous substances are known to have been released or disposed of, each deed for the transfer of such property shall have a covenant warranting that:

- All remedial action necessary to protect human health and the environment, with respect to any such substances remaining on the property, has been taken before the date of transfer
- Any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States

By definition, all remedial action has been taken if the construction and installation of an approved remedial design has been completed and the remedy has been demonstrated to the US Environmental Protection Agency (EPA) and Maryland Department of the Environment (MDE) to be operating properly and successfully.

The release or disposal of hazardous substances at the NPSHD, and the actions that have been taken or may need to be taken, are discussed in sections 4.9 and 5.9, "Hazardous and Toxic Materials."

#### **2.2.4 Interim Maintenance of Property Until Disposal**

Until the NPSHD is transferred to its new owner(s), the property will require caretaker management. Normally, the Army would maintain excess facilities for an initial period that could range from 15 months to 2 years after the Army's Report of Excess is accepted by GSA. AR 405-90, "Disposal of Real Estate," Section 4-3, requires that excess real property be protected and maintained as necessary "to prevent vandalism and development of unsafe conditions, to maintain property values, and to promote good public relations." GSA's Federal Property Management Regulations (FPMR), Section 101-47.4913, provides guidelines for the minimum maintenance necessary to meet these goals. In addition, the procedures outlined in the Army's Technical Memorandum (TM) 5-801-2 "Historic Preservation: Maintenance Procedures" will apply to the NPSHD as an historic property. These interim minimal maintenance activities are essentially the same as described in Section 3 for the No-Action Alternative and to current maintenance activities.

After the initial period, GSA normally assumes responsibility for routine maintenance, subject to available funding. Upon accepting the Report of Excess, GSA normally would issue a memorandum to specify the level of maintenance GSA will commit to after the Army's period of responsibility expires. However, because the NPSHD is an historic property, the Army and GSA intend to negotiate an MOA, and to renegotiate it as needed during the screening and disposal process, to ensure an appropriate level of maintenance until the property is transferred to a new owner.

The Army is applying \$400,000 annually for maintenance of the NPSHD. Routine maintenance includes actions such as annually inspecting and maintaining roofs, checking and repairing plumbing and electrical systems, repairing water leaks, repairing unsafe floor coverings, exterior painting (in limited areas), repairing failing structural members, operational inspection of boilers and water pumps, maintaining fire alarm systems and motion detectors, removing debris, and pest control. All work on historic buildings will be performed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

As discussed previously, the Army completed several high-priority stabilization and repair projects in 1999, which were derived from the 1997 *Comprehensive Plan for Basic Repair and Stabilization*. No additional stabilization or repair projects of this type are anticipated before disposal, unless special legislation provides funding for particular projects, beyond the annual maintenance activities described above.

## 2.2.5 Interim Leasing

The Military Leasing Act of 1956 (10 USC Code, 2667, as amended) permits the Army to implement interim leasing of excess facilities. Under this statutory provision, an interim lease cannot exceed more than 5 years, unless a longer term is approved by the Secretary of the Army. Interim uses cannot preclude any future Army options or irrevocably commit resources until this EA is completed. Before leasing, the Army must document that the requirements of CERCLA Section 120(h)(3) have been met and that the property poses no unacceptable risk to human health or the environment if leased for the intended use.

WRAMC has an existing lease for the use of Carroll House (Building 125) by a nonprofit group that provides shelter to the homeless. The lease has a 2-year term, which will expire in the summer of 2000, and is revocable at will by the Army. Unless it becomes part of a disposal arrangement under the provisions of the McKinney Act, this lease will be terminated, in accordance with the lease provisions, at an appropriate point in the disposal process.

WRAMC currently is negotiating a lease for use of the Japanese Pagoda (Building 108) by SOS, the local nonprofit organization that has been performing activities including volunteer renovation work on the Pagoda. The term and conditions of this lease are expected to be similar to the existing Carroll House lease.

No other interim leases to prospective users of buildings at the NPSHD are anticipated at this time.



## 3. Alternatives

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### 3.1 Introduction

This section describes the alternatives that were considered for the NPSHD property. In accordance with NEPA regulations, including AR 200-2, reasonable alternatives are developed to provide the basis for evaluating potential environmental impacts in Section 5, “Environmental and Socioeconomic Consequences.” The factors that were considered by the Army in considering alternatives are discussed in subsection 3.3, “Screening Criteria for Alternatives.” Alternatives that were determined not to be reasonable are discussed in subsection 3.4, “Alternatives Not To Be Evaluated In Detail.”

The following reasonable alternatives have been identified:

- **Alternative 1 – Excessing the NPSHD:** reporting the 27-acre NPSHD parcel to GSA as excess property, which will allow the screening and disposal process to begin
- **Alternative 2 – Excessing the NPSHD with Additional Parcels:** reporting the NPSHD along with one or both of two adjoining parcels as excess property, which will allow the screening and disposal process to begin and will provide an additional incentive in marketing the NPSHD
- **Alternative 3 – No-Action:** retaining the NPSHD property indefinitely in its current underutilized condition
- **Alternative 4 – Mothballing:** retaining the NPSHD property indefinitely and implementing a process to secure the buildings, while planning for the future of the property

The following subsections describe these alternatives in more detail.

None of these alternatives consider any active Army reuse of the property, other than continuing the current minimal level of occupancy in a few of the buildings. If the NPSHD property is not reported for excess and if Army reuse proposals are developed in the future, then subsequent NEPA documentation will be required.

### 3.2 Alternatives To Be Evaluated

#### 3.2.1 Excessing the NPSHD

Alternative 1 is to formally declare the 27-acre NPSHD property as excess to the needs of the Army and to forward a “Report of Excess Real Property” to the GSA. Doing so will initiate the GSA’s process of screening, marketing, and ultimately disposing of the property. Alternative 1 is described in detail in Section 2, “Description of Proposed Action.”

### 3.2.2 Excessing the NPSHD with Additional Parcels

Alternative 2 is the Army's preferred alternative for implementing the proposed action, if operational considerations and funding issues can be worked out.

Under Alternative 2, the Army would report up to 37 acres of land as excess property, including the NPSHD and one or both of the two adjacent parcels (see Figure 3-1):

- **Parcel 1:** the approximately 27-acre NPSHD property
- **Parcel 2:** the approximately 4.7-acre "Linden Lane parcel" to the south of the NPSHD, which contains a non-historic laboratory and two historic houses (Buildings 189, 135, and 139)
- **Parcel 3:** the approximately 5.5-acre "railroad parcel" to the east of the NPSHD, next to the CSX railroad tracks, which contains a non-historic warehouse, a non-historic salt storage dome, and an historic house (Buildings 178, 179, and 136)

#### 3.2.2.1 Rationale for Additional Parcels

The 1995 *Forest Glen Adaptive Reuse Study* concluded that making these additional parcels available would add value to the transaction for potential new owner(s), by providing more developable land with fewer of the costs associated with renovating historic buildings (see subsection 2.1.5.2). Excessing the additional parcels could make the NPSHD easier to market and could increase the chances of finding a new owner and achieving an economically viable, adaptive reuse for the historic district.

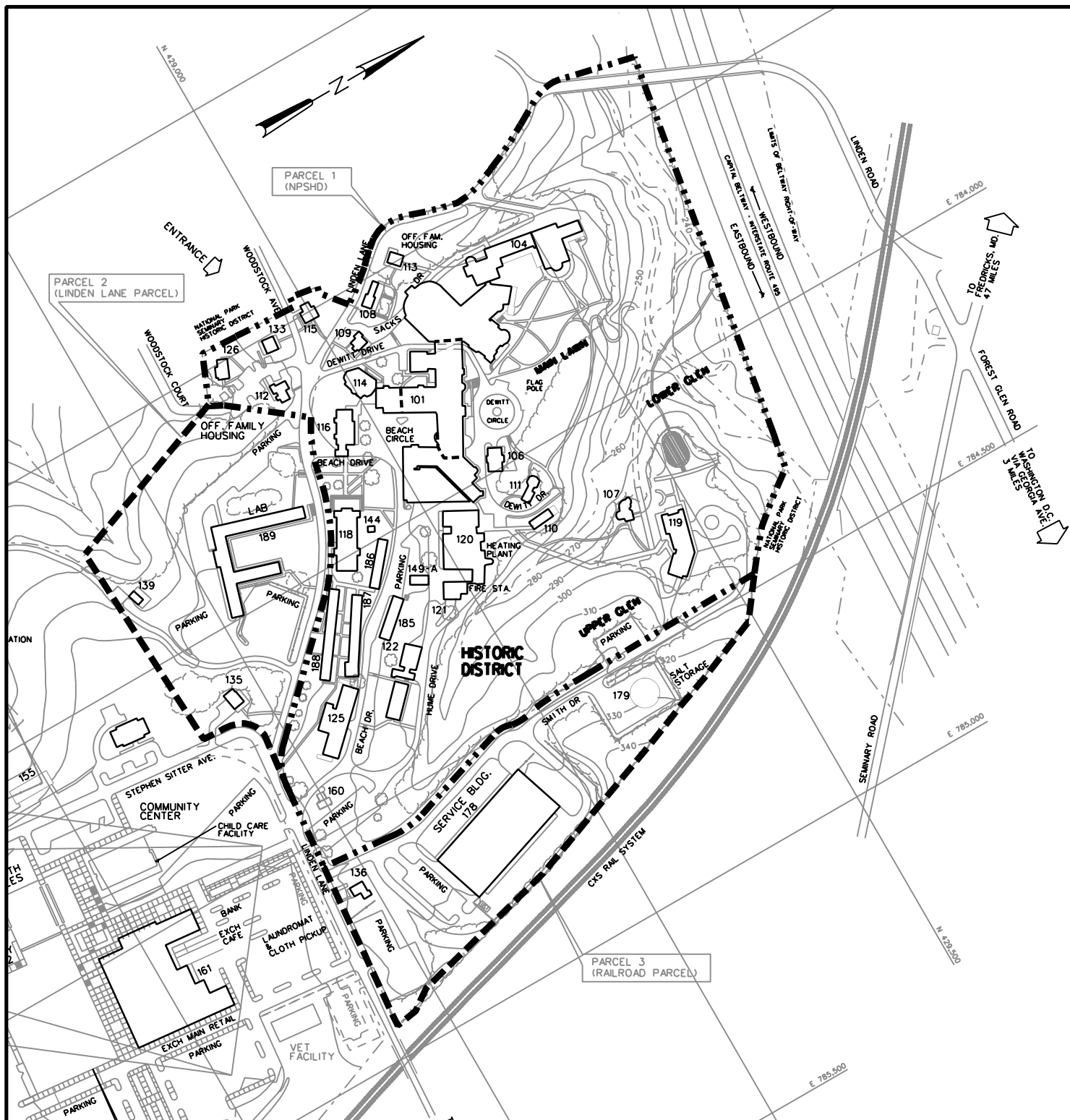
The proposal to excess Parcels 2 and 3 is still being evaluated for operational and programmatic considerations. Thus far, the Army can only commit to excessing the NPSHD itself (Parcel 1), because one of the additional parcels contains active Army facilities.

If a Report of Excess Property that includes one or both of these additional parcels is approved, they could be offered as an option for negotiation with prospective buyers of Parcel 1. However, Parcels 2 and 3 would not be available for acquisition without Parcel 1.

#### 3.2.2.2 Active Army Facilities on the Additional Parcels

None of the existing facilities on Parcel 2 are required by WRAMC. Buildings 135 and 139 on Parcel 2, which were formerly used for officer housing, are vacant. Building 189, the former "Sleep Lab," is vacant; the research activities once housed there were relocated to the new WRAIR building in 1999. Building 189 is slated for demolition in the first quarter of FY 2000 as part of the WRAIR project, which was previously addressed in the EA for the 1992 Forest Glen Master Plan (RGH, 1990).

Two existing facilities on Parcel 3 are still in active use: the warehouse (Building 178) and the salt storage dome (Building 179). If Parcel 3 is reported as excess property, these two facilities will be replaced elsewhere at Forest Glen Annex. Building 136 (the Thrift Shop) on Parcel 3 will not be replaced.



## LEGEND

- HISTORIC DISTRICT BOUNDARY
- ADDITIONAL PARCELS BEING CONSIDERED FOR EXCESSING

**Figure 3-1**  
**ALTERNATIVE 2-**  
**ADDITIONAL PARCELS**

NPSHD, Forest Glen Annex  
Walter Reed Army Medical Center

**CH2MHILL**

A previously-approved site is available for the warehouse. The 1992 Master Plan proposed expanding the existing supply and storage area in the southern portion of the Forest Glen Annex, west of Stephen Sitter Avenue (behind the new WRAIR parking facility). A new medical supply warehouse for prepositioned war reserve medical materials was planned in this area, to support WRAMC's mobilization mission, and was evaluated in the 1990 Master Plan EA (Astore, 1992; RGH, 1990). The mobilization requirement no longer exists, making the site available for building a general-purpose warehouse to replace Building 178.

A DD Form 1391 for the replacement warehouse has been completed by WRAMC and coordinated with MEDCOM and the project has been programmed in the FY 2002 budget for MCA funding (Porter, personal communications, 8/9/99 and 10/6/99). The Army is investigating the possibilities for short-term leaseback options, if needed, until a new facility can be completed.

The existing salt storage dome (Building 179) could be physically relocated to a new site, which would need to be graded and improved first. This minor project can be accomplished with local (installation, not MCA) funding. A new site for the salt dome was not addressed by the 1992 Master Plan, but it likely would be located on or near the site of the replacement warehouse, as it is now (Porter, personal communication, 8/9/99).

Separate NEPA documentation will be prepared<sup>1</sup> to evaluate the environmental impacts associated with constructing replacement facilities elsewhere at Forest Glen, and will be completed before any transfer action that includes these parcels is implemented.

### 3.2.3 No-Action Alternative

Including the No-Action Alternative in NEPA documents is prescribed by CEQ regulations and serves as a benchmark against which the proposed federal action can be evaluated. Under the No-Action Alternative, the Army would retain ownership of the NPSHD and the property would be maintained indefinitely in its current underutilized condition.

Alternative 3, No-Action, is not a desirable alternative, because it does not satisfy the Purpose and Need of the proposed action (as described in Section 1) while requiring some continued financial outlay by the Army. However, if the NPSHD property is not transferred or sold to another party, the No-Action Alternative represents a reasonably foreseeable outcome, at least in the short term.

In the absence of other directives or agreements, the Army would maintain the property at a level consistent with the maintenance of facilities located on inactive installations and in accordance with any existing agreements relating to maintenance standards for the NPSHD. Any work done on historic buildings would be performed in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*.

As a part of implementing the No-Action Alternative, the Army would continue to identify projects in WRAMC's Annual Work Plan that are required for essential maintenance and repair of NPSHD facilities, as needed to protect the structures from fires, safety hazards, or nuisance conditions.

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<sup>1</sup> Anticipated to be completed in FY 2000

Ongoing maintenance activities may include (but not be limited to):

- Continuing to repair damage to roofs as part of the ongoing maintenance program
- Continuing routine exterior maintenance activities, such as cleaning and repairing gutters, repairing water leaks, and repairing or reinforcing structural members that pose an imminent safety threat to pedestrians or could compromise the structural integrity of building envelopes
- Continuing security patrols and maintaining security systems, such as the existing motion detectors and interior and exterior security lights, to reduce vandalism and fire hazards
- Periodically inspecting all unoccupied structures and physically securing them against ground-floor entry
- Periodically maintaining landscapes around unoccupied structures and continuing other land management programs, such as pest control, to prevent safety hazards and nuisance conditions
- Removing damaged or diseased trees near buildings and roads that pose an imminent safety threat to pedestrians, cars, or buildings
- Maintaining responsibility for fire protection and prevention, including periodic inspection and testing of existing automatic fire alarms and sprinkler systems
- Continuing to support painting and other minor projects for exterior building maintenance, preservation, and appearance under the terms of the Cooperative Agreement between the Army and SOS
- Maintaining access onto the property for service and maintenance of publicly or privately owned utility or infrastructure systems that traverse the property

If the No-Action Alternative is implemented, the Army will need to reconsider the future of the NPSHD in the next revision of the Forest Glen Master Plan and in any associated NEPA documentation. The Master Plan revision has been programmed for FY 2000 and typically takes several years to complete.

### 3.2.4 Mothballing Alternative

Under Alternative 4, Mothballing, WRAMC would retain the buildings indefinitely as vacant properties until some other decision is reached about their ultimate disposition. (The Army also would need to reconsider the future of the NPSHD in the next revision of the Forest Glen Master Plan and in any associated NEPA documentation.) In addition to the routine maintenance described under the No-Action Alternative, “mothballing” involves temporary measures to protect historic buildings from weather and vandalism, until a solution to the questions of funds for preservation or reuse planning issues can be resolved. Activities would be guided by the National Park Service (NPS) Preservation Brief No. 31 “Mothballing Historic Buildings.” WRAMC would negotiate an MOA with the Maryland

SHPO, in consultation with the ACHP if necessary, to document the planned mothballing measures.

(The Army uses the term “laying away” to describe similar measures used to protect the value of inactive industrial or production facilities for possible future use. In the case of historic buildings for which there is no planned future use, the term “mothballing” is the more appropriate term.) According to NPS Preservation Brief No. 31, comprehensive mothballing programs involve the following steps:

### Documentation

1. Document the architectural and historic significance of the property. This has been accomplished for the NPSHD through the NRHP nomination form and subsequent documents, including the current Cultural Resources Management Plan (CRMP).
2. Prepare a condition assessment. This has been accomplished by the *Facility Condition Assessment* and *Site Condition Assessment* reports that were prepared as part of the 1996 Facility Use Study.

### Stabilization

3. Structurally stabilize the buildings based on the condition assessment. Some of this work was done in FY 1999; additional limited stabilization projects would be identified and accomplished as necessary. This step would include measures such as replacing structural members in areas that are facing imminent collapse due to wood rot—for example, the front porch on Building 101. This step would not include all of the more extensive projects identified by the *Comprehensive Plan for Basic Repair and Stabilization*, although that plan could be used to guide some necessary projects.
4. Exterminate or control pests, including termites and rodents. This is part of WRAMC’s routine maintenance activities for the NPSHD.
5. Protect the exterior from moisture penetration. This is part of WRAMC’s routine maintenance activities for the NPSHD.

### Mothballing

6. Secure the buildings and component features to reduce vandalism or break-ins. This is an ongoing activity at the NPSHD.
7. Provide adequate ventilation to the interior (to keep wood dry and prevent rotting).
8. Secure or modify utilities and mechanical systems (for example, draining plumbing lines and filling with antifreeze).
9. Develop and implement a maintenance and monitoring plan for protection of the property.

### 3.3 Screening Criteria for Alternatives

The Army considered several screening criteria, or goals, that align with the Purpose and Need for this action (see Section 1), to determine which alternatives are or are not reasonable Army alternatives for the purposes of this EA:

- a) Supports WRAMC's mission (and the missions of its tenants), by providing suitable space for current or anticipated mission-related activities and by directing funding to mission-critical activities
- b) Can realistically be achieved, given operational Army constraints, including downsizing, privatization initiatives, and fiscal limitations
- c) Promotes preservation of historic properties at the NPSHD (if not all, then as much as possible)
- d) Fosters an economically viable and productive reuse of the NPSHD
- e) Supports community cohesion, by recognizing the value of the NPSHD as an established and valued feature of the local community, by providing for a future use that would be compatible with the adjoining residential area, and by supporting the Army's efforts to be a good neighbor at the Forest Glen Annex, now and in the future

Table 3-1 illustrates the results of applying these goals as screening criteria to a variety of potential alternatives.

**Alternative 1, Excessing the NPSHD**, meets or could meet all of the goals. Excessing supports WRAMC's mission and operational constraints by removing unproductive facilities (and the cost of maintaining them) from the real property inventory. It advances the goals of preservation, viable reuse, and community cohesion by initiating (after years of uncertainty) a well-defined, time-tested process to find a new owner for the property.

**Alternative 2, Excessing the NPSHD with Additional Parcels**, also meets or could meet all of the goals. It reduces the "score" of this alternative in terms of WRAMC's mission, because one of those parcels contains facilities that are still being used. However, it increases the likelihood of finding a new owner (thus removing the NPSHD buildings from WRAMC's inventory) and of achieving an economically viable reuse. Thereby, it also increases the likelihood of historic buildings being preserved by the new owner.

**Alternative 3, No-Action**, fails to meet four of the five goals. However, the No-Action Alternative must be retained for two reasons: (1) because it is required by NEPA regulations as a baseline, and (2) because it is a realistically foreseeable (although undesired) outcome, if the excessing process is not concluded successfully.

**Alternative 4, Mothballing**, fails to meet the goal of supporting WRAMC's mission and only partially supports the other goals. Keeping the buildings vacant would not serve the interests of the local community. This alternative provides enhanced protection for the historic buildings in the short term, but it does not provide a long-term viable reuse for them. If excessing is not selected, however, the Mothballing Alternative is potentially

**TABLE 3-1**  
Screening Criteria for Alternatives

Alternatives	Supports WRAMC mission	Realistic given operational constraints	Promotes preservation of historic properties	Fosters economically viable and productive reuse	Supports community cohesion (good neighbor)
1. Excessing					
2. Excessing with Additional Parcels					
3. No-Action					
4. Mothballing					
5. Comprehensive Stabilization (vacant)					
5a. Stabilization with 4 houses renovated and occupied					
6. Full Rehabilitation and Army reuse					
7. Partial Rehabilitation/ Demolition and Army reuse					
8. Complete Demolition and (future) Army reuse					
<b>Key to Symbols</b>					
Does not meet	Unlikely to meet	Could meet (neutral or uncertain)	Likely to meet	Most likely to meet	



achievable and it would be preferable to the No-Action Alternative in terms of the preservation and (future) reuse goals.

Alternatives 1 through 4 have been determined to be reasonable Army alternatives. The potential environmental and socioeconomic impacts of these alternatives will be analyzed in Section 5.0 of this EA.

The remaining alternatives that were considered fail to support two or more goals and do not fully achieve any of the goals, except for Full Rehabilitation, which would fully satisfy the preservation goal but is not economically or operationally feasible for the Army. The following subsections provide additional details about these alternatives and the reasons for eliminating them from further consideration in this EA.

## 3.4 Alternatives Not To Be Evaluated in Detail

### 3.4.1 Comprehensive Stabilization

Additional repair and stabilization measures for NPSHD are described in the *Comprehensive Plan for Basic Repair and Stabilization* (May 1997), to replace deteriorated infrastructure and to provide a more stable environment for the long-term preservation of the NPSHD's historic resources.

Under this alternative, described as **Scenario 1** in the *Economic Feasibility Study*, WRAMC would stabilize and retain the buildings in their current low-occupancy level, until some other decision is reached about their ultimate disposition. This alternative assumes full performance of all the additional stabilization measures that are described in the *Comprehensive Plan for Basic Repair and Stabilization*, estimated at an initial cost of approximately \$17 million or \$36.2 million in life-cycle costs, including maintenance (Higginbotham/Briggs & Associates, et al., 1998). These costs are projected to rise even higher if work is delayed. By comparison, WRAMC was able to obtain funding of only \$1 million for stabilization projects in FY 1999.

Design work completed in FY 1999 on specific projects extracted from the Comprehensive Plan (see subsection 2.1.3.1) revealed that the cost estimates in this document were unrealistic, because design costs were not included and line-item estimates were not used. For some of the projects (such as roof replacement), expensive equipment that proved necessary to perform the work was not anticipated. It is likely that the true cost of implementing this plan in full would be considerably higher than estimated.

In addition to standard mothballing measures, such as ensuring ventilation, repairing roof leaks, and securing windows, the Comprehensive Plan recommended more extensive projects such as replacing whole roofs, gutters, and deteriorated wall materials; painting wood elements; rebuilding unstable foundations and structural members; repairing or replacing mechanical building systems and site utilities; removing a number of trees that threaten to fall on buildings; and providing an entirely new storm drainage system, to correct conditions affecting building foundations.

Funding to fully implement the Comprehensive Plan has not been appropriated to date and cannot be assumed. There is no Army mechanism for funding such extensive stabilization work, on facilities for which there is no requirement or plan for future productive use. It is unlikely that funding would be approved for this alternative without special legislation, which cannot be assumed.

(Funding also would be difficult to obtain for the Mothballing Alternative, for the same reasons, but because those measures are more modest and are supported by regulatory guidance for historic properties, obtaining funding for Mothballing is more feasible than obtaining funding for Comprehensive Stabilization.)

In addition, Comprehensive Stabilization is a stop-gap measure that would not render the buildings useable and thus would not achieve any mission-related or other productive reuse of the property. The property also would continue to divert WRAMC maintenance funding away from mission-critical facilities. Because the buildings would remain vacant, the interests of nearby residents would not be well-served.

Comprehensive Stabilization fails to meet mission or operational criteria, does not provide an economically viable reuse, and does not adequately support community cohesion. Therefore, Comprehensive Stabilization is not further analyzed as a reasonable alternative in this EA.

#### **3.4.1.1 Stabilization Option: Renovating Selected Residences for Military Housing**

There are four buildings located south of Linden Lane, which were previously used for family housing, which are adjacent to private residences in the Forest Glen Park neighborhood:

- Postmaster's House (Building 126)
- Edgewood (Building 133)
- Indian Mission (Building 112)
- Miller Library (Building 115)

Nearby residents have expressed interest in seeing these four buildings reoccupied. This option, although desirable from the standpoint of the surrounding community, is unfortunately not feasible because extensive work would be needed to make any of these buildings suitable for military family housing and because current DOD policy calls for privatizing military housing stock, rather than expending funds to acquire new units (or to substantially upgrade existing substandard units). In 1998, WRAMC attempted to gain funding for this purpose, but it was denied. This option fails to meet mission or operational criteria and is not further analyzed in this EA.

#### **3.4.2 Full Rehabilitation and Army Reuse**

In 1996, the Army initiated a comprehensive facility study at the NPSHD, which resulted in four reports, collectively referred to as the Facility Use Study. The *Preliminary Feasibility Study* and the *Economic Feasibility Study* (Higgenbotham/Briggs & Associates, 1997b and 1997d) detailed the possible uses for the property and the structural and other work that would need to be done to make the buildings safe and efficient for such uses.

**PFUS Scenario 2.** According to cost analyses for Scenario 2 in the *Economic Feasibility Study*, the initial costs of renovating all buildings, site features, and site utilities at the NPSHD are estimated to be \$85.9 million, or \$219.8 million in 10-year life-cycle costs, including maintenance. However, returning all parts of Building 101 to active use would pose serious life safety challenges and would not meet the requirements of the Uniform Building Code for Allowable Area without significantly altering the building's egress patterns.

**PFUS Scenario 3.** As documented in the *Economic Feasibility Study*, Scenario 3 involves renovating the majority of buildings and demolishing nine buildings at the NPSHD, at an initial cost of \$76.4 million or life-cycle costs of \$90.9 million. This scenario was fully developed by the *Preliminary Facility Use Study*. Scenario 3 would be more feasible than Scenario 2, in terms of space utilization and ability to meet the Uniform Building Code, and would also be somewhat less costly.

However, because the Army has no validated requirement for the NPSHD buildings and does not anticipate being able to use these buildings for mission-related activities in the foreseeable future, the cost of rehabilitating all of the historic buildings, site features, and site utilities cannot be justified. It is extremely unlikely that funding for either of these scenarios could be obtained. In addition, fully redeveloping the property for Army use, although it best supports the preservation of historic properties, would also generate the highest levels of Army-related traffic on local streets, which reduces its compatibility with the adjoining neighborhoods.

Full Rehabilitation and Army Reuse does not meet mission or operational criteria and does not foster an economically viable reuse, because its cost would exceed its potential value to the Army. Therefore, the Full Rehabilitation alternative is not a reasonable alternative and is not further analyzed in this EA.

### 3.4.3 Partial Rehabilitation and Army Reuse

In 1997, because of the high estimated cost of the Full Rehabilitation scenarios, the Army began to consider less-costly alternatives for reusing the NPSHD. The following scenarios were under consideration for inclusion in the (discontinued) EIS for Army reuse of the NPSHD.

**Partial Demolition/Rehabilitation Scenario.** This scenario involved rehabilitating a selected number of buildings for adaptive reuse as a conference center and park. Seven historic structures would be fully rehabilitated: Buildings 121-Fire Station, 107-Castle, 108-Pagoda, 101a-The Main ("Ye Forest Inn"), 101h-Ballroom, 101e-Kitchen/Dining Wing, and 101g-Presidents House (see Figure 2-1.) The four houses located south of Linden Lane (Buildings 112, 115, 126, and 133, previously described) would be declared excess and offered for transfer or disposal (sale) as private residences. All other NPSHD structures would be demolished. This scenario was not developed until after the Facility Use Study was completed, so a detailed cost estimate was not prepared; it can be assumed that costs would be less than for Scenario 3 (see above) and similar to, or possibly more than, Scenario 4 (see below).

The unoccupied land and two of the buildings (the Castle and Pagoda) would be leased to Montgomery County, the M-NCPPC, or the NPS for management and operation as a

neighborhood park and museum, under a cooperative agreement or long-term lease with the Army. The Army would retain fee-simple ownership of the NPSHD property and would retain the option of terminating the lease and reclaiming the property for redevelopment in the future, under certain specified circumstances.

Before demolition, the Army would document the significance of the historic structures and the site through detailed photographs and drawings, in accordance with the Historic American Building Survey and Historic American Engineering Record (HABS/HAER) program, under an MOA that would be negotiated among the Army, the Maryland SHPO, and the ACHP. Before any historic structures are demolished, the structures or their architectural components would be offered for sale on the condition of relocation (at the purchaser's expense) away from the Army's NPSHD property.

However, other than the Fire Station, the Army has no requirement for any of the NPSHD buildings. The primary purpose of retaining some of the buildings under this scenario would be to provide a link to the historic district's rich history and to preserve some reminder of the site's previous appearance, use and value to the surrounding community.

**PFUS Scenario 4.** As documented in the *Economic Feasibility Study*, Scenario 4 would renovate only Building 101 (Main and all its subparts) and would demolish (after recordation) all other free-standing buildings, at an initial cost of \$59.1 million or \$66.6 million in life-cycle costs. However, this scenario would not preserve any of the historic site layout and relationships or the variety in architectural styles of the NPSHD. Also, Scenario 4 would not provide as much use and value to the surrounding community as the Partial Demolition/Rehabilitation Scenario described above, because it would not provide separate, dedicated building space for park or museum use. In addition, renovating Main in its entirety would pose serious life safety challenges and would not meet the requirements of the Uniform Building Code for allowable area, without significantly altering the building's egress patterns (Higgenbotham/Briggs & Associates, 1997d).

For both of these Partial Rehabilitation scenarios, the cost of rehabilitation would have been very difficult to justify without a mission-related requirement. In addition, the large number of buildings to be demolished would likely have been opposed by interested parties, which could have resulted in additional legal costs and considerable delay.

Partial Rehabilitation and Army Reuse fails to meet mission or operational criteria, preserves only a portion of the historic buildings and layout, and is not likely to be either acceptable enough to the community, or beneficial enough to the Army, to justify the cost of its implementation (economic viability). Therefore, it is not considered to be a reasonable alternative and is not further analyzed in this EA.

### 3.4.4 Complete Demolition and Army Reuse

(The following scenario was under consideration in 1997 in the (discontinued) EIS for Army reuse of the NPSHD.)

Under this scenario, the Army would retain fee-simple ownership of the NPSHD property. All structures on the NPSHD property would be demolished. The unoccupied land would be leased to Montgomery County, the M-NCPPC, or the NPS for management and

operation as a park, under a cooperative agreement or long-term lease with the Army. The Army would be responsible for demolition and for revegetating the sites of demolished buildings. The park agency would be responsible for staffing and operating the park, for any outdoor recreational improvements, and for maintaining the grounds. The Army would retain the option of terminating the lease and reclaiming the property for future redevelopment, under certain specified circumstances.

As described under the partial demolition scenario, the Army would document the significance of the historic structures and the site, through detailed photographs and drawings in accordance with the HABS/HAER program, under an MOA that would be negotiated among the Army, the Maryland SHPO, and the ACHP. Thereby, the research value of the property would be preserved for the future. Before demolition, structures or their architectural components would be offered for sale, on the condition of relocation (at the purchaser's expense) away from the Army's property.

This scenario would offer the greatest flexibility to the Army for redeveloping the property, if some mission-related need were identified in the future (although no current mission or mobilization need for the land has been identified). It also would remove the financial liability of indefinitely maintaining vacant buildings. However, it would result in the complete and irreversible loss of a valued historic resource, which would be difficult to justify unless the Army had an overriding need to redevelop the land for mission-critical facilities, or unless all other viable alternatives (such as disposal to another entity) had been tried and failed.

Complete Demolition would be intensely opposed by the spectrum of parties interested in the NPSHD and would almost certainly result in litigation, with attendant legal costs. Consequently, Army reuse of the parcel could be delayed indefinitely and the economic advantage of having a cleared site available for future redevelopment could be outweighed by legal costs.

Therefore, Complete Demolition is considered so unacceptable to the community as to outweigh its potential benefits to the Army and it is not further analyzed as a reasonable alternative in this EA.

## 4. Affected Environment

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### 4.1 Introduction

This section is divided into 13 subsections that describe existing conditions for the natural and socioeconomic resources at the NPSHD and, as applicable, for the Forest Glen Annex and the surrounding area. These descriptions serve as the baseline against which the potential effects of the proposed action and alternatives are evaluated.

#### 4.1.1 Regional Location

WRAMC's Forest Glen Annex is located in the greater Silver Spring area of southeastern Montgomery County, Maryland. Forest Glen Annex is approximately 2 miles northwest of the Silver Spring Central Business District (CBD) and 1.5 miles north of the District of Columbia border. Forest Glen Annex is bounded by the Capital Beltway (I-495) to the north, Rock Creek Park to the west, Brookville Road to the south, and the main line of the CSX Rail System to the east (see Figure 1-1).

The NPSHD is an approximately 27-acre parcel on the north end of the Forest Glen Annex, bounded by the Capital Beltway (I-495) on the north, Smith Drive on the east, and Linden Lane and the neighborhood of Forest Glen Park to the south and west (see Figure 2-1). The two additional parcels that are being considered for possible excessing along with the NPSHD under Alternative 2 are located south of Linden Lane and between Smith Drive and the CSX rail line (see Figure 3-1).

#### 4.1.2 Climate

The Forest Glen Annex is geographically located on the transition zone between northern and southern climates of the country. Atmospheric conditions are influenced by the Blue Ridge Mountains to the west and the Chesapeake Bay to the east. The prevailing wind is from the northwest during the winter months, and from the southeast in the summer. The maximum wind speed was recorded to be 80 miles per hour (mph) from the southeast. Average wind speed is 9.1 mph.

The normal daily mean temperature is 55°F for this area, with recorded extremes of -7°F in the winter and 105°F in the summer. Normal annual precipitation is 40.8 inches and average annual snowfall is 20.4 inches for this area (National Climatic Data Center, 1998).

## 4.2 Land Use

### 4.2.1 Installation Land Use

The Forest Glen Annex is comprised of about 159 acres of land, of which about 80 acres are built-up or managed landscapes. The remaining 79 acres are unimproved land, most of

which is wooded, steeply sloped land, intersected by ravines and stream valleys in the western and northeastern portions of the property (including the “Glen” in the NPSHD, from which the Forest Glen Annex got its name). The original installation property was approximately 182 acres of land. Earlier property transfers at the Forest Glen Annex have included 8 acres that were provided for the construction of I-495 and the CSX railroad, 5 acres to Rock Creek Park, and 10 acres to M-NCPPC (Astore, 1992).

Installation land use at the Forest Glen Annex is governed by the 1992 Master Plan, which will be updated in the near future. Figure 4-1 shows the generalized land-use concept and land-use plan according to the 1992 Master Plan and Table 4-1 summarizes the existing land-use allocations (acreage).

Forest Glen Annex provides research and auxiliary support services for WRAMC’s Main Section in Washington, D.C. WRAIR is the principal research activity at the Forest Glen Annex and is in the process of being consolidated and relocated to Forest Glen, with activities coming from Building 40 on the Main Section, leased space, and scattered facilities on Forest Glen, including Buildings 185 to 188 in the NPSHD.

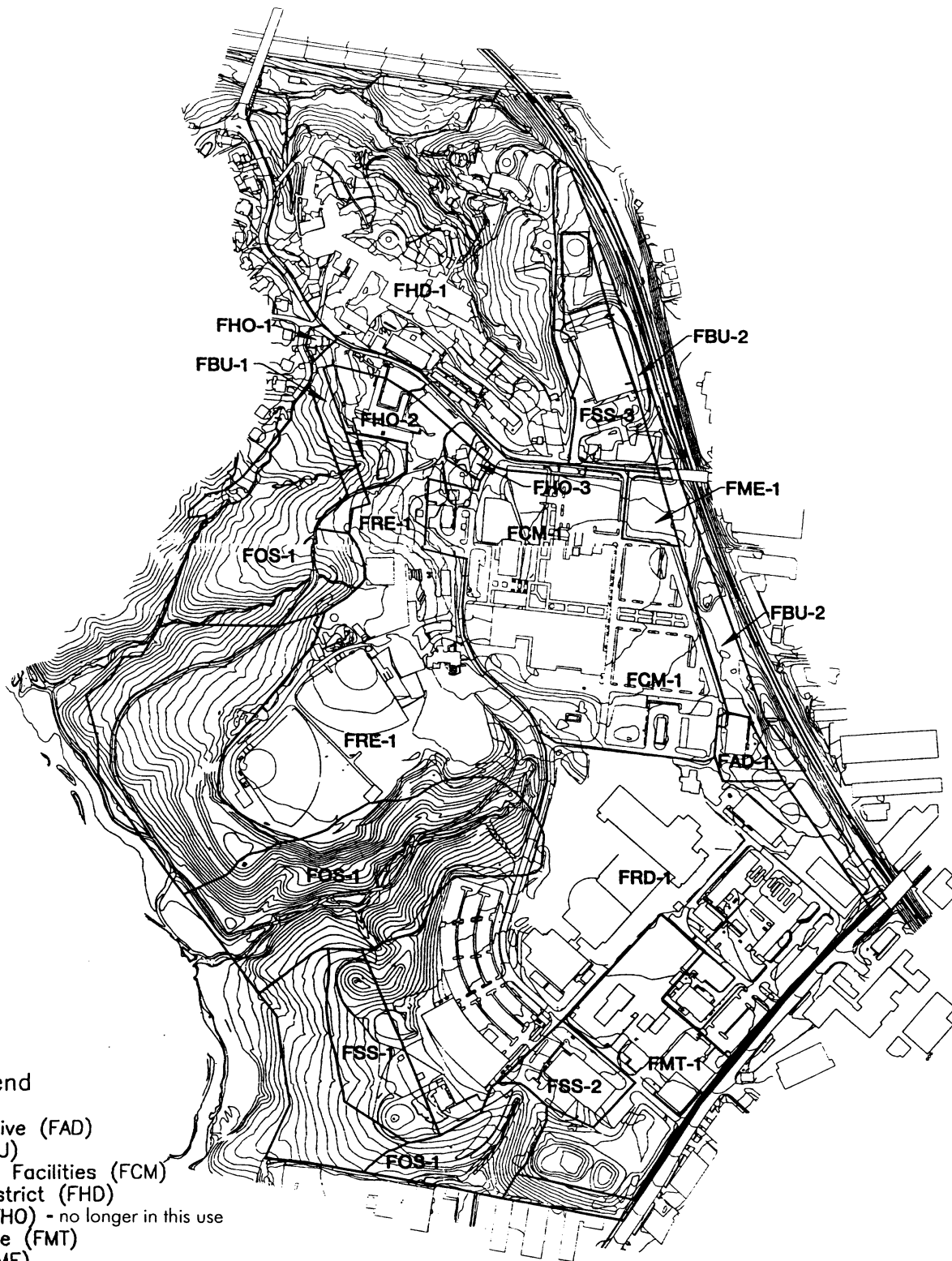
The new WRAIR facility (Building 503) and parking garage (Building 514), near the main entrance at Brookville Road and Stephen Sitter Avenue, was completed in 1999. When the WRAIR building is fully occupied, medical research and development land uses at Forest Glen Annex will be concentrated in the southern portion of the property.

Building 189, a non-historic laboratory building adjacent to the NPSHD (Figure 2-1) is programmed for demolition in the first quarter of FY 2000, as part of the new WRAIR building project. Four similar non-historic laboratories in the NPSHD (Buildings 185 to 188) are listed for eventual demolition if the Army retains the NPSHD property, but their demolition is not currently programmed.

Supporting activities at Forest Glen Annex are comprised of community facilities, mostly concentrated in a military shopping complex that serves both WRAMC personnel and many military retirees in the Washington, D.C. area; a guest house for families of hospital patients; supply and storage facilities; and maintenance facilities, including an auto shop, motor pool, and Facilities Engineer shop.

Army land-use categories in the NPSHD, which predate the 1992 Master Plan, included administration, recreation, utilities, and family and troop housing. Current land uses in the mostly vacant NPSHD are limited to minimal administrative use and utilities, primarily the Power Plant (Building 120), the Fire Station (Building 121), and temporary housing in the Carroll House shelter (Building 125). The 1992 Master Plan designated Parcel 2 for recreation and housing use and Parcel 3 for supply and storage use.

Because the 1992 Master Plan assumed that the NPSHD would be excessed, future Army land use was not evaluated for that parcel in the Master Plan. If the NPSHD is not declared excess, the question of future Army land-use categories for the NPSHD will be reexamined in the next revision of Forest Glen Annex Master Plan, which will begin in FY 2000.



### Legend

- Administrative (FAD)
- Buffer (FBU)
- Community Facilities (FCM)
- Historic District (FHD)
- Housing (FHO) - no longer in this use
- Maintenance (FMT)
- Medical (FME)
- Open Space (FOS)
- Recreation (FRE)
- Research and Development (FRD)
- Supply and Storage (FSS)

### Legend

- Land Use
- Historic District

Sources: Astore, 1992; Woolpert, 1998.



0 300  
Scale in Feet

Figure 4-1  
INSTALLATION LAND USE CONCEPT  
NPSHD, Forest Glen Annex  
Walter Reed Army Medical Center



## 4.2.2 Surrounding Land Use

### 4.2.2.2 Existing Land Use and Zoning

The area surrounding the Forest Glen Annex is considered part of Montgomery County's Urban Ring, consisting of the close-in suburbs of Washington, D.C. The area is composed primarily of long-established residential communities, along with some small commercial areas, and is densely developed and almost completely built-out.

The neighborhoods surrounding the installation are depicted in Figure 4-2.

The existing zoning in the surrounding area is shown in Figure 4-3. *The North and West Silver Spring Master Plan*, currently being prepared by M-NCPPC, proposes little or no change to zoning in the vicinity of Forest Glen Annex and the NPSHD (M-NCPPC, 1998e).

TABLE 4-1

Forest Glen Annex Land-Use Allocations

Category (Code)	Approximate Acreage
Administration (FAD)	0.8
Community Facilities (FCM)	19.0
Family Housing, Officer (FHO) <sup>1</sup>	2.0
Maintenance (FMT) <sup>2</sup>	8.3
Medical (FME)	0.6
Open Space/Wetlands (FOS)	16.6
Recreation (FRE)	20.7
Medical Research, Development and Testing (FRD)	29.4
Supply and Storage (FSS)	8.8
Buffer Zone (FBU)	26.2
Primary Circulation	2.0
Historic District (FHD) <sup>3</sup>	23.5
Brookville Road Right-of-Way <sup>3</sup>	1.5
<b>Total</b>	<b>159.2</b>

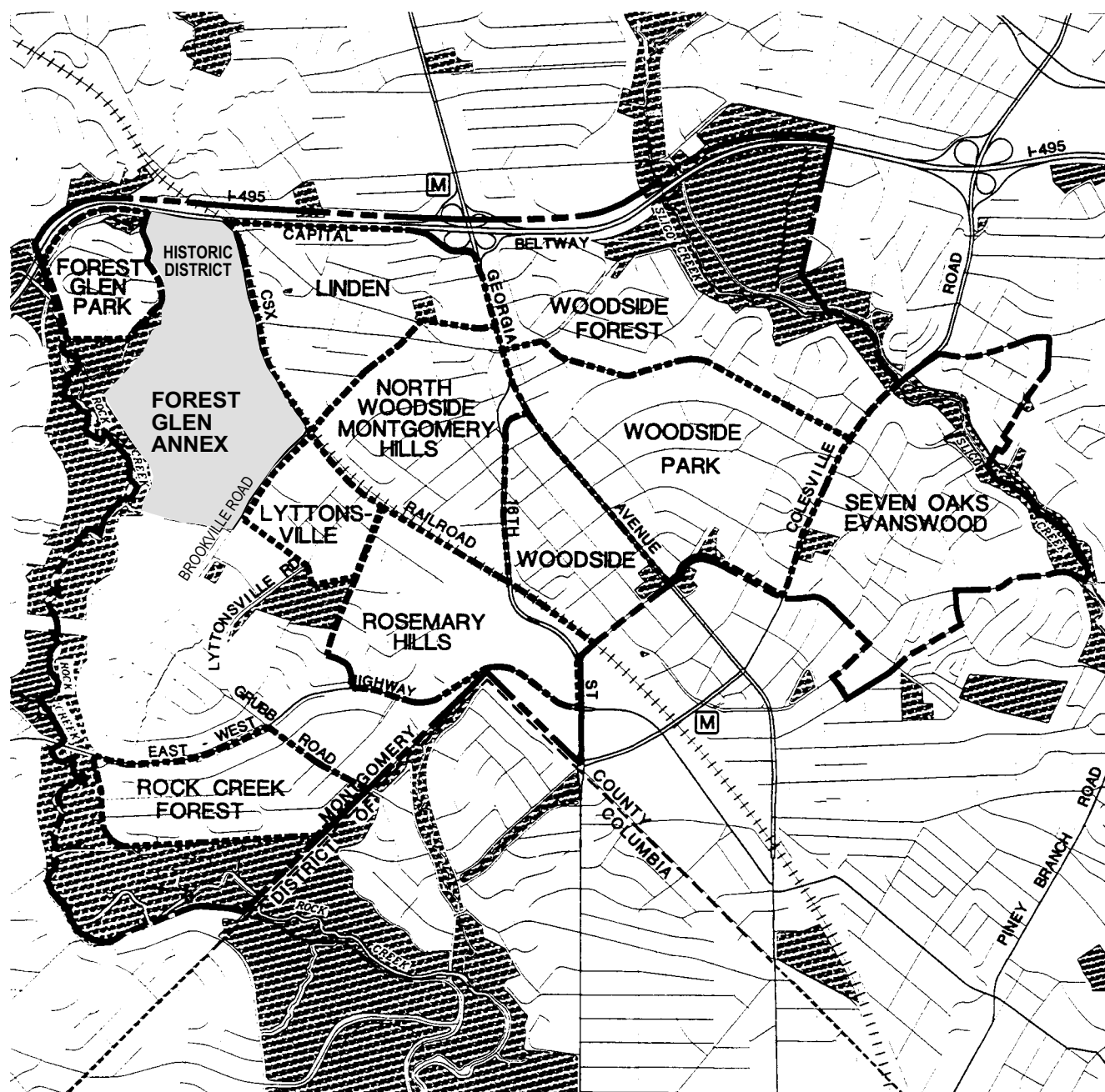
Category codes correspond to Figure 4-1. Circulation and ROW are not shown on the figure.

1. Included Buildings 112, 115, 126, and 133 in the NPSHD and Buildings 135 and 139 nearby. These buildings are no longer deemed suitable for family housing and are vacant.

2. Includes a new Fire Station planned to replace Building 121 in the NPSHD.

3. Area recommended for disposal in the 1992 Master Plan, which excluded the four houses south of Linden Lane. A 1999 real estate survey for excessing shows the entire NPSHD as 27.4 acres.

Source: Astore, 1992



Parkland



WRAMC  
Forest Glen Annex



Metro Station

----- Neighborhood Boundary

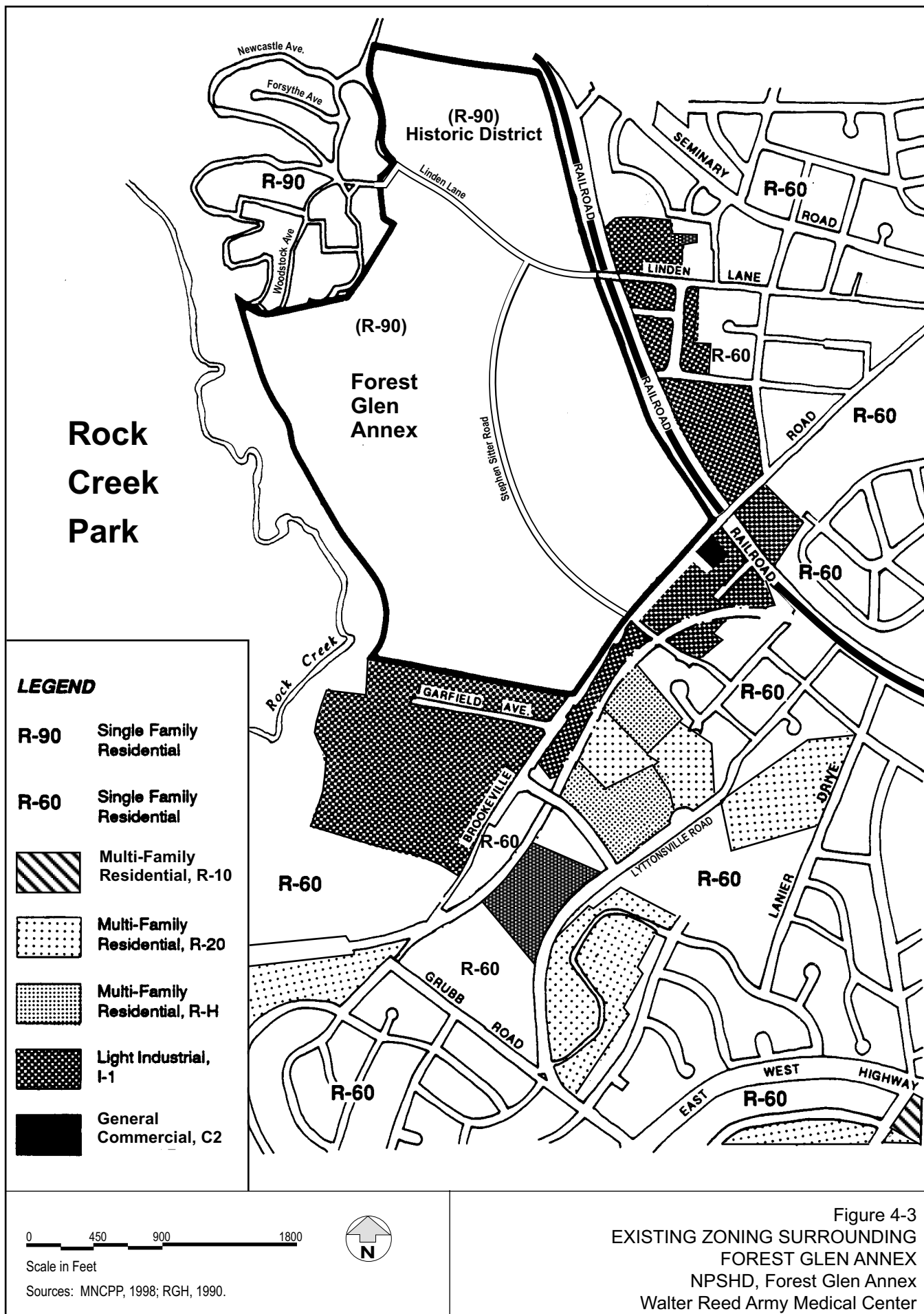
0 575 1150 2300

Scale in Feet



Source: North and West Silver Spring Master Plan  
M-NCPPC, 1998.

Figure 4-2  
SURROUNDING NEIGHBORHOODS  
NPSHD, Forest Glen Annex  
Walter Reed Army Medical Center



The most sensitive surrounding land uses are the residential neighborhood of Forest Glen Park and the parkland of Rock Creek Park (National Park Service), both of which are adjacent to the NPSHD and to the installation's recreation and open space zones. The Linden neighborhood is separated from Forest Glen Annex by the CSX railroad (Figure 4-2). Rock Creek Park is a regional recreation and conservation area that borders most of the western boundary of Forest Glen Annex. Future land use compatibility at the NPSHD is of major concern to the residents of the nearby neighborhoods, particularly Forest Glen Park (west) and Linden (east).

Immediately to the east and south of Forest Glen Annex, along Brookville Road, the CSX railroad right-of-way, and Garfield Avenue, there are limited areas of land that are zoned for light industrial use (I-1) with a very small commercial/retail zone. Current land uses include warehouses, a radio tower, a Washington Suburban Sanitation Facility, a Montgomery County Ride-On Bus depot and maintenance facility, an animal shelter, offices, and other commercial uses. Altogether, there are over 110 acres of industrial land uses in the Brookville Road-Linden Lane area (M-NCPPC, 1997).

To the northeast, beyond the industrial zone, much larger areas of land are zoned for single-family residential use (R-60). Other development in this residential area includes Woodlin Elementary School and the Hebrew Academy (soon to be relocated and replaced by another community use), bounded by apartments and commercial activities along Georgia Avenue. To the northwest, bordering Forest Glen Annex, the land is zoned for low-density residential use (R-90); this is the neighborhood of Forest Glen Park.

To the southeast, beyond the industrial zone, the land is zoned for medium and high-density multi-family (R-20 and R-H, high-rise) and moderate-density single-family (R-60) residential use. Current development includes town houses, garden apartments, a high-rise development, single-family houses, and the Rosemary Hills Recreation Center and park.

The current land-use plan for Forest Glen Annex is generally compatible with surrounding land uses. The medical research, supply/storage, and maintenance zones are concentrated in the southern and eastern portions of the installation, along Brookville Road and the CSX railroad, where the bordering off-post land uses and zoning are light industrial. Residential areas beyond the industrial zone are more likely to be directly affected by those land uses than by Forest Glen Annex.

A buffer zone has been established around the installation (see Figure 4-1) and was recommended to be landscaped or fenced, to separate incompatible on-post and off-post activities (Astore, 1992).

#### 4.2.2.3 Land Use Planning

The M-NCPPC is in the process of preparing a combined master plan for the communities of North Silver Spring and West Silver Spring, which border the Forest Glen Annex (Figure 4-2). Existing master plans for other portions of the surrounding area are about 20 years old. Because these communities are fully developed, the updated *The North and West Silver Spring Master Plan* focuses on maintaining and enhancing the quality of life for residents and businesses in this area.

The current Montgomery County zoning of the NPSHD is R-90 (low to moderate-density single-family residential). That zoning category, which does not apply to Army land use but which will take effect if the property leaves federal ownership, reflects the adjacent off-post zoning. It does not reflect the historic uses of the NPSHD buildings or the potential future uses that might be found for the NPSHD property. The issue of future zoning for the NPSHD is addressed by the October 1998 public hearing draft of *The North and West Silver Spring Master Plan*, which recommends that the County prepare a minor master plan amendment for the NPSHD if the property's proposed reuse cannot be accommodated by the existing R-90 zoning (M-NCPPC, 1998).

Other planning recommendations made by *The North and West Silver Spring Master Plan* regarding future land use at the NPSHD are to maintain the historic integrity of the district, "including the buildings, relationships between the buildings, and the character of the open space"; provide for private conservation easements or public ownership in environmentally sensitive areas; provide access for public or quasi-public use of buildings such as the Pagoda, Ballroom, and Chapel; minimize impacts on the surrounding neighborhoods such as traffic, noise, and light; and provide trail connections through the property to other county trails.

#### 4.2.2.4 Annual Growth Policy

Montgomery County's Adequate Public Facilities Ordinance limits land development on the basis of whether existing and programmed public facilities (such as schools, transportation, water and wastewater capacity, and public safety services) will be adequate to serve new subdivisions. The Annual Growth Policy divides the county into 25 Policy Areas (based on groupings of transportation zones), many of which correspond to the county's Planning Areas. The policy attempts to balance growth in jobs and housing (M-NCPPC, 1997).

For each fiscal year (FY), growth capacity ceilings are calculated for policy areas. County planning staff keeps track of approved development plans (pipeline development) and other data. When the development pipeline in a Policy Area rises to meet growth capacity ceilings, the Planning Board cannot approve additional development, with certain exceptions. Approval of development above these ceilings is contingent on the construction of public facilities that will add the needed capacity (M-NCPPC, 1997).

Under the FY 1998 Annual Growth Policy, Montgomery County instituted the Expedited Development Approval Procedure, applicable from 1997 to 2001, more commonly known as "Pay-and-Go." This procedure allows developers to pay a development excise tax to the County, instead of providing the needed public facilities or providing funding and waiting for the County to construct them. In May 1998, the County Council amended the Annual Growth Policy to prohibit use of the "Pay-and-Go" procedure for certain types of residential development. In October 1999, in response to concerns about worsening traffic congestion, the Council voted to end the "Pay-and-Go" program altogether.

The NPSHD is in the Silver Spring/Takoma Park Policy Area and is adjacent to the Bethesda-Chevy Chase Policy Area. The Silver Spring CBD was established as a separate Policy Area in 1987, but impacts of CBD development on the surrounding areas are taken into consideration when transportation ceilings are set for the CBD. According to the

FY 1998 Annual Growth Policy, the Silver Spring/Takoma Park, Silver Spring CBD, and Bethesda-Chevy Chase Policy Areas all have adequate capacity for growth, in both jobs and housing (M-NCPPC, 1997).

## 4.3 Air Quality

The U.S. Environmental Protection Agency (EPA) established National Ambient Air Quality Standards (NAAQS) pursuant to Sections 109 and 301(a) of the Clean Air Act (CAA). These standards, expressed in micrograms per cubic meter, establish safe concentration levels for each criteria pollutant. NAAQS have been set for six pollutants: particulate matter less than 10 microns in aerodynamic diameter (PM-10), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), and lead (Pb). The federal air quality standards as established by the EPA are presented in Appendix B.

Areas not meeting the NAAQS are designated as nonattainment for the specific pollutant. The United States is divided into attainment and nonattainment areas, usually by county or Metropolitan Statistical Area. The CAA General Conformity Rule requires federal agencies to make written conformity determinations for federal actions in or affecting NAAQS in nonattainment or maintenance areas. WRAMC's Forest Glen Annex is in the Maryland Department of the Environment (MDE) Air Quality Control Area IV. Montgomery County is classified as a serious nonattainment area for ozone.

### 4.3.1 Existing Emissions

The only currently operating air-permitted source in the NPSHD is the boiler in Building 120, the Power Plant. This boiler is a 700-hp Cleaver-Brooks Company scotch marine boiler, with a heat input rating of 29.3 million British thermal units per hour (mBtu). The boiler burns only natural gas. Two other boilers in the plant formerly burned fuel oil, but those boilers are no longer operational (Williams and Porter, 10/12/99). Outside of the NPSHD at Forest Glen, there are nine permitted boilers.

In addition, there are 13 emergency generators at Forest Glen Annex, which fire No. 2 fuel. Two of these emergency generators are permitted and both are outside of the Historic District. The remaining emergency generators are insignificant sources and are located outside of the Historic District, with the exception of one insignificant emergency generator, a 100-kW diesel unit, which is used in the Historic District for Building 120.

Insignificant sources are sources that do not require air permitting. The insignificant emergency generators mentioned above have a heat input rating below the air permitting limit set by the state.

Also at the Forest Glen Annex, but outside of the Historic District, there is a permitted air stripper that is treating contaminated groundwater at Building 500 (see subsection 4.5.2.2 "Groundwater Quality") and four permitted gasoline underground storage tanks. Other storage tanks exist throughout the Forest Glen Annex, but do not require air permitting because they contain No. 2 fuel oil and are traditionally not significant emission sources.

Table 4-2 summarizes the emissions inventory of criteria pollutants from the one operating boiler and one emergency generator located in Building 120 in the Historic District.

TABLE 4-2  
Air Emissions - Existing Conditions at NPSHD

Sources	Pollutants (tons per year)				
	SO <sub>2</sub>	NO <sub>x</sub>	CO	PM-10	VOC
Boiler	0.01	2.33	1.95	0.18	0.013
Generator (insignificant source)	<0.01	0.02	0.01	<0.01	< 0.01
<b>Total</b>	<b>0.01</b>	<b>2.35</b>	<b>1.96</b>	<b>0.19</b>	<b>0.013</b>

Source: 1999 Emissions Certification

The only source of mobile emissions at the NPSHD is from the vehicular traffic associated with the regular operations at the Forest Glen Annex and other unrelated traffic that uses Linden Lane. Vehicular emissions are not a significant source for NPSHD, because most of the Historic District is not occupied.

### 4.3.2 Title V Program

Under the CAA Title V program, a facility is considered a major source if its potential emissions exceed the regional trigger levels established by the EPA. The trigger levels for a major source in Montgomery County, Maryland, are:

- 100 tons per year of SO<sub>2</sub>
- 25 tons per year of NO<sub>x</sub>
- 100 tons per year of CO
- 100 tons per year of PM-10
- 25 tons per year of VOCs

Estimating the potential to emit assumes a maximum operating schedule of 24 hours per day, 365 days per year, at the unit's maximum capacity, unless its capacity is limited by the conditions of an existing, federally enforceable permit. Potential emissions, by definition, are equal to or greater than actual emissions. Therefore, if a facility exceeds the trigger levels on the basis of actual emissions, it should be assumed that it will exceed these levels on the basis of potential emissions.

Forest Glen Annex's total actual emissions exceed the trigger levels for the region. WRAMC has submitted a revised Title V application to the state and is awaiting approval. However, the emissions from the Historic District alone do not trigger Title V requirements.

## 4.4 Noise

There are no major sources of noise being generated in the NPSHD itself. The only potential sources of noise in the NPSHD or the additional parcels are occasional blower blow-down or

steam release at the Power Plant and intermittent truck traffic at the warehouse (Building 178) on Parcel 3.

The helicopter pad in the west-central area of the Forest Glen Annex has historically been the only major source of occasional noise at the installation. Helicopter operations are infrequent.

WRAMC is currently investigating complaints from some nearby residents about noise at Forest Glen; the suspected source is the ventilation system at the new WRAIR building (Sanders, personal communication, 8/6/99). As the new WRAIR building becomes fully occupied, vehicular traffic will increase, mostly in the southern portion of the installation, which will increase the noise audible at peripheral residences and businesses.

From offsite sources, there is continuous noise from traffic on the Capital Beltway and (to a lesser degree) from traffic on Georgia Avenue and connector roads, as well as intermittent noise from the CSX rail system along the eastern boundary of the Forest Glen Annex. Noise from these sources affects both the NPSHD and the adjacent neighborhoods, which have sought installation of noise barriers along the Beltway. The commercial and industrial land uses to the south of Forest Glen Annex also generate some offsite noise.

The Forest Glen Annex itself tends to attenuate offsite noise to some degree, due to large expanses of trees on the site, as does Rock Creek Park to the west of the property (RGH, 1990c).

## 4.5 Water Resources

### 4.5.1 Surface Water

#### 4.5.1.1 Description of Resources

There are few surface-water features at the Forest Glen Annex. Two small drainageways in the Historic District contain water during storm events or periods of high water table and the flow is from the center of the Historic District westward. The drainageways join together to form a perennial stream, which then flows southwest to Rock Creek.

No springs or areas of groundwater seeps were observed at this stream (RGH, May 1990). A few areas contiguous to the stream were wet; however, these areas were downslope of drainage pipe outfalls and did not appear to be springs or groundwater seeps. The *Delineation of Federal Wetland Jurisdictional Boundaries for Walter Reed Army Medical Center: Forest Glen Section* (Woolpert, 1998) report did not identify these wet areas as jurisdictional wetlands or waters of the United States. Substantial filling and culverting activities were noted along the stream corridor (RGH, 1990), suggesting that the springs or groundwater seeps once reported in the area (Keyes, Lethbridge, and Condon, 1973) have likely been filled, within the last 10 years or longer.

The headwaters of a second stream are located within Parcel 2. Other wet-weather drainageways are located in the central and southern parts of the Forest Glen Annex. A perennial stream locally known as Ireland Creek (Woolpert, 1997) originates near the center of the Forest Glen Annex and flows southwest. Ireland Creek was identified as waters of the



U.S in September 1997 (Woolpert, 1998). All of the drainageways and the streams carry water to Rock Creek, which discharges to the Potomac River approximately 7 miles south of Forest Glen. Two ponds are located in the east-central part of the Forest Glen Annex.

According to the National Flood Insurance Program, only a small portion of Rock Creek's 100-year floodplain is located within the Forest Glen Annex. It is located in the southern portion of the base adjacent to Rock Creek Park, near the mouth of Ireland Creek, and extends approximately 300 feet into the installation along the lower portion of the creek (U.S. Department of Housing and Urban Development, 1979). This area is not in or near the NPSHD.

#### **4.5.1.2 Surface-Water Quality**

No information is available about the water quality of flow in the drainageways because there are no stream sampling sites within the Historic District. The Metropolitan Washington Council of Governments (MWCOC) maintains a sampling site on Rock Creek at K Street, which is approximately 11 miles downstream of the Forest Glen Annex (RGH, September 1990).

The assumption is that the onsite drainageways, like most urban streams, are affected by surface runoff carrying various chemicals, such as lead from automobile exhausts, motor oil, and road salt, and by septic constituents from leaking sewer lines.

The onsite streams are classified as Class I/I-p streams by the Maryland Department of Natural Resources (MDNR) (STV/Lyon, 1994). These are waters that are suitable for water-contact sports; play and leisure-time activities where the human body may come into contact with the surface water; fishing; the growth and propagation of fish (other than trout), other aquatic life, and wildlife; and agricultural and industrial water supply. No in-stream work may occur in Class I streams from March 1 through June 15 of any year.

The surface water on the Forest Glen Annex is not used as a drinking-water supply or for any purposes associated with Forest Glen Annex operations.

### **4.5.2 Groundwater**

#### **4.5.2.1 Description of Resources**

The underlying geologic material is massive crystalline rock and weathered bedrock. Groundwater occurs in the fractures of the rock and in the overlying weathered bedrock (STV/Lyon, 1994). The shallowest depth to the water table (17 feet) reportedly was encountered at the WRAIR building, located about 1 mile south of the Historic District.

Although the movement of groundwater through the fractures will influence the directions of groundwater flow, in general, groundwater is expected to move in the direction of the topographic slope (i.e., westward toward Rock Creek and northward toward the Capital Beltway).

Johnston (1964) reports that the yield of wells drilled into the Kensington is small (i.e., less than 20 gallons per minute). This is consistent with the relatively impermeable nature of massive crystalline rocks.

A survey of available records (EDR, 1995) identified four unused wells within a distance of 2 miles of the Forest Glen Annex. Three of the wells were from 1 to 2 miles away. One well, located in Forest Glen, is an estimated 300 feet deep; the location of the well is uncertain.

#### 4.5.2.2 Groundwater Quality

Data on water quality are limited because few investigations have been done on this subject. The assumption is that the groundwater is typical of urban groundwater resources, with low but ubiquitous levels of chemicals such as lead from automobile exhausts and septic constituents from leaking sewer lines.

The groundwater near Buildings 500 and 512, outside the NPSHD, is contaminated with free-phase petroleum hydrocarbon products (CH2M HILL, 1996). The free-phase product was observed during the excavation of an underground storage tank (UST) in 1992. Monitoring wells were installed to determine the extent of contamination. In late 1993, a groundwater-treatment system consisting of a solid/oil-water separation unit, an air-stripping unit, and a granular activated-carbon unit was installed to treat the free-phase and dissolved contaminants. The location where the groundwater remediation is occurring is about 2,000 feet south-southeast of the NPSHD.

The groundwater on the Forest Glen Annex is not used as a drinking-water supply or for any purposes associated with WRAMC's operations.

## 4.6 Geology

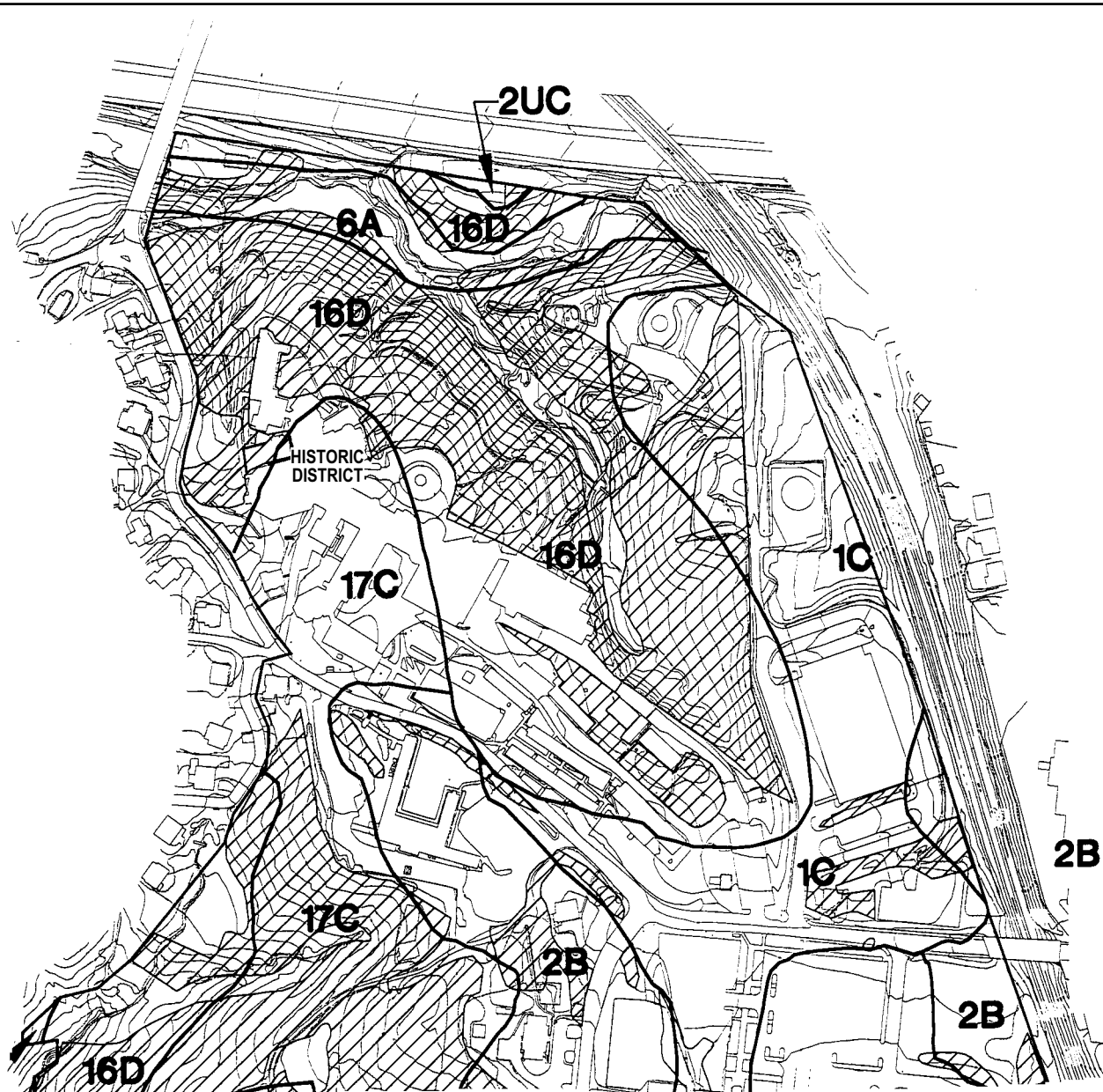
### 4.6.1 Topography

The topography of the developed part of the Forest Glen Annex ranges from approximately 190 to 340 feet above mean sea level (msl). The terrain consists of rolling hills sloping to the west, low slopes in the undeveloped part located in the center of the Historic District, and steep stream valleys around the drainageways leading to Rock Creek. The surface elevation drops to about 230 feet msl to the north near the Capital Beltway and to about 190 feet msl in low areas on the western side of the Forest Glen Annex. The highest elevations occur in the southern and eastern parts of the Forest Glen Annex. The topography of the Forest Glen Annex is shown in Figure 4-4.


The Forest Glen Annex appears on the Kensington, Maryland, U.S. Geological Survey (USGS) 7-½ minute topographic quadrangle map.

### 4.6.2 Geology

The Forest Glen Annex is located along the eastern edge of the Piedmont Plateau physiographic province. Cloos, Ernst, and Cooke (1953) and Johnston (1964) describe the underlying bedrock as crystalline biotite granite and its metamorphic equivalents consisting of clinozoisite, epidote, and quartz. They identify the rock as the Kensington Granite Gneiss of unknown age. The Maryland Geological Survey (1964) describes the rock as Kensington Quartz Diorite. Alternatively, Fleming et al. (1994) attributed the underlying bedrock to the Ordovician Kensington Tonalite and described it as intensely foliated biotite-muscovite



### Legend

- 1C Galia Silt Loam, 0-3% Slope
- 2B Glenelg Silt Loam, 3-8% Slopes
- 2C Glenelg Silt Loam, 8-15% Slope
- 2UC Glenelg-Urban Land Complex, 8-15% Slope
- 6A Baile Silt Loam, 0-3% Slope
- 16B Brinklow-Blocktown Channery Silt Loam, 3-8% Slope
- 16D Brinklow-Blocktown Channery Silt Loam, 15-25% Slope
- 17C Occoquan Loam, 8-15% Slope
- 53A Codorus Silt Loam, 0-3%, Occasionally Flooded
- 65B Wheaton Silt Loam, 0-8% Slope
- 67UB Urban Land-Wheaton Complex, 0-8% Slope
- 116E Blocktown Channery Silt Loam, 15-25% Slope, Very Rocky
- 400 Urban Land
-  Areas of Highly Erodible Soils

0 300  
Scale in Feet



Sources: Draft Integrated Natural Resources Management Plan,  
Woolpert, 1999; Soil Survey of Montgomery County Maryland, 1988.

Figure 4-4  
SOILS AND TOPOGRAPHY  
NPSHD, Forest Glen Annex  
Walter Reed Army Medical Center

granodiorite. All of these rock types are similar and are characterized by a massive crystalline nature and fractures that develop from regional stresses on the rock.

A layer of weathered bedrock, known as saprolite, occurs at some locations on the Forest Glen Annex.

### 4.6.3 Soils

Woolpert (1997) reported that there are 12 soil types representing 8 soil series at the Forest Glen Annex (Figure 4-4).

All of the soils are well-drained except for the Baile silt loam along the drainage by the northern boundary of the Forest Glen Annex and the Codorus silt loam along Rock Creek and the western boundary of the Forest Glen Annex. The two latter soils are poorly drained and moderately well-drained to somewhat poorly drained, respectively.

Seasonal high water tables are from 1 to 2 feet below the surface for Codorus silt loam (November through April), 0 to 0.5 feet below the surface for Baile silt loam (November through April), and greater than 5 feet below the surface for the remaining soils. Soils typically having bedrock near the surface are the Brinklow-Blocktown channery silt loam, the Occoquan silt loam, and the Blocktown channery soil loam. These three soil types predominate in the western and central parts of the Forest Glen Annex.

These soils, as well as adjacent soil types along the western boundary of the Forest Glen Annex, have moderate to steep slopes (8 to 45 percent) and, consequently, have moderate to severe erosion potentials.

In areas where development has occurred, the soils have been disrupted and their properties will differ from those in undisturbed areas. In a letter dated July 23, 1997, the District Conservationist, U.S. Department of Agriculture, stated that only a few acres on the site contain soils that qualify as prime farmland or soils of statewide concern and that the Farmland Protection Act does not apply, due to the urban location and built-up nature of the site (Appendix A).

### 4.6.4 Seismic Hazards

The seismic hazard at the Forest Glen Annex is very low. The U.S. Geological Survey Internet site that provides information on seismic hazards (USGS, 1998) was consulted for quantitative information. Less than 8 percent of the acceleration of gravity (% g) would be exceeded 2 percent of the time during a 50-year period and less than 3 % g would be exceeded 10 percent of the time during a 50-year period.

By way of comparison, the analogous values are greater than 80 percent and greater than 15 percent, respectively, for Charleston, South Carolina, which experienced a strong earthquake in 1886.

## 4.7 Infrastructure

### 4.7.1 Utilities

#### 4.7.1.1 Potable Water Supply

The Forest Glen Annex purchases all of its water from the Washington Suburban Sanitary Commission (WSSC). The Patuxent River is the primary source of water to WSSC's two reservoirs, which have a combined capacity of 12.5 billion gallons. Purification consists of a water treatment plant, sedimentation, filtration, sterilization and pH adjustment. There are no water storage facilities on the installation.

Water is furnished by two WSSC water mains and distributed by a government-owned system. A WSSC 12-inch main paralleling the north side of Linden Lane supplies water to the NPSHD. The southern part of the site is supplied by a 16-inch WSSC main that runs along Brookville Road. All of the connections to the WSSC mains are metered. Except for an interconnection between the first two taps off Brookville Road, there are no interconnections between the various taps off the WSSC mains (Higginbotham/Briggs & Associates [HBA], 1997b).

The water is distributed throughout the installation by a network of 6-inch and 8-inch cast iron pipes that serve both domestic and fire protection functions. Overall, the water distribution system appears to be in good working order (HBA, 1997b). Only two leaks in the underground water distribution system have occurred in the past 10 years, and in both cases, these were due to construction or other repair activities and were not due to a natural failure in the piping.

Observations made during recent repairs indicated significant tuberculation in the iron mains with up to 50 percent loss in capacity. However, capacity problems have not been found during the installation's annual fire flow tests. The fire hydrants and the exterior of the iron mains are reported to be in good condition. System pressure at Building 120 was observed at 75 pounds per square inch (psi), a satisfactory working pressure for both fire protection and domestic use (HBA, 1997b).

#### 4.7.1.2 Wastewater System

WSSC also provides wastewater collection and treatment services to the Forest Glen Annex. Wastewater collected at the Annex is discharged into the WSSC's Rock Creek sewer interceptor, which in turn empties into the District of Columbia's sewerage system.

Sewage from the NPSHD and the warehouse (Building 178) empties into a 15-inch WSSC main crossing the northern portion of the installation. The system in this area consists of 4-inch, 6-inch, and 8-inch vitrified clay and cast iron pipes. All lines are gravity flow with the exception of a 4-inch cast iron force main from the pump chamber on the south side of Building 156. The pump chamber contains two 4-inch, two horsepower (hp) centrifugal pumps.

The system is estimated to be in satisfactory operating condition. In a 1997 study including document review, field inspections, and communications with maintenance staff, no reports

of sewage backup or leakage were noted. The manholes are constructed of brick with cast iron covers and some manholes have missing bricks and loose manhole frames. In some locations, site activities have resulted in breakage of some of the clay storm sewer piping. Although there have been no reports of excessive infiltration and inflow into the system, the deteriorated manholes and pipes may cause infiltration and inflow (HBA, 1997).

#### **4.7.1.3 Stormwater Collection System**

Generally, the NPSHD consists of structures and paved areas separated by narrow strips of grass. Approximately 80 percent of the site is impervious. The predominant drainage direction on the site is from southwest to the northeast. Two large swales, one originating adjacent to Hume Drive and the other one originating adjacent to Sacks Drive, drain the runoff generated from the site and discharge it into an unnamed tributary of Rock Creek (see Figure 2-1).

Yard and grate inlets, in conjunction with a few french drains, are the predominant types of collection structures used throughout the site. An investigation into the sizes and types of pipe used in this collection system indicates that the existing system is undersized and insufficient to handle the runoff generated from the contributing area based on the typical design criteria of capacity for a 10-year storm (HBA, 1997).

A site condition assessment of the NPSHD drainage system was conducted in 1996. In general, the storm sewer system was found to be antiquated and insufficient to handle the runoff generated during average storm events of 1-inch or greater rainfall. A majority of the system consists of 4- to 8-inch vitrified clay pipes. Numerous grate inlets found in the field were silted over and, therefore, ineffective at collecting runoff. In many cases, the runoff either ponds around the inlet or simply bypasses the inlet and enters into another drainage subbasin. Some inlets that could not be field located may have been paved over with asphalt. Also, it was noted that the approach areas to many of the inlets do not direct the runoff towards the inlet (HBA, 1997).

Specific areas on the site appear to have sustained large quantities of concentrated runoff. As a result, soil has eroded, and scour or sump holes or both have formed, which are compromising structures. Problems are occurring adjacent to both building foundations and roads (HBA, 1997).

#### **4.7.1.4 Solid Waste Disposal**

No landfill operations are conducted at the installation. Municipal-type (household, office, commercial) solid waste is collected by a commercial contractor and hauled off-post to the County landfill in Laytonsville.

### **4.7.2 Energy**

#### **4.7.2.1 Electrical System**

The Potomac Electric Power Company (PEPCO) supplies electrical power to the post. Service is in the form of 13,200 volts, 3 phase, 3 wire, 60 cycle (Astore, 1992).

At the PEPCO Metering Station (Building 160) located at the intersection of Linden Lane and Beach Drive, the voltage is transformed to 4,160 volts by a 2,000-kilovolt ampere (kVA) pad-mounted, oil-filled transformer, and is distributed onsite using overhead wood pole line construction. The Army owns all onsite electrical facilities, including the transformer and switching station. In addition to NPSHD buildings, this distribution serves Building 178 on Parcel 3 (the warehouse), Building 189 (former WRAIR laboratory) on Parcel 2, and Buildings 152 (Family Activities/Recreation building) and 156 (Veterinary Clinic) on a nearby portion of Forest Glen Annex.

All of the buildings in the NPSHD and Parcels 2 and 3 have overhead service, except for Building 186, which has an underground service.

Most of the present electrical distribution system appears to be over 30 years old and is approaching the end of its useful life. Many of the poles and structures are exhibiting weather deterioration, some of the original transformers have been replaced and some transformers are missing (i.e., between Building 104 and the Ballroom). As originally constructed, including the missing transformers, the electrical system's capacity is approximately 5 watts per square foot of building area. This capacity is adequate for non-air conditioned facilities with low-occupancy loads. Modern commercial air conditioned spaces require approximately 15 watts per square foot (HBA, 1997).

#### **4.7.2.2 Natural Gas System**

Washington Gas Light Company furnishes natural gas to the Forest Glen Annex. A 6-inch, steel, high-pressure main paralleling Linden Lane and Woodstock Avenue supplies the NPSHD and Community Center complex. A second 6-inch, steel, high-pressure main paralleling Brookville Road supplies the industrialized and research area. The entire system is owned by the Washington Gas Light Company.

#### **4.7.2.3 Steam Distribution System**

Three main heating plants currently serve the Forest Glen Annex. A plant in Building 120 serves the NPSHD. The other two plants serve the Research and Development Area (Building 500) and the Community Center Complex (Building 163). The plants are not interconnected. The capacity of these central heating plants is adequate to serve only the existing buildings that are connected to the plants (Astore, 1992). There are individual heating systems in Buildings 506, 508, 511, 602, and 606.

Steam is used at the Forest Glen Section for heating, cooking, sterilizing, and production of hot water for domestic and laboratory use. In Building 120, steam is generated at about 70 psi by a gas-fired 700-hp Cleaver-Brooks Company scotch marine boiler. Steam is distributed underground to the buildings still on the system. Only the buildings in the Historic District and Building 189 on Parcel 2 are served by this system. Many of the outlying buildings have been disconnected from the system and no longer have heat.

The majority of the present system dates from the original construction of the buildings. The piping system is constructed with individually insulated steel pipe for the supply and condensate returns. This piping is run in concrete conduit underground except to repaired portions where prefabricated steel conduit is used. The runs in the basement and crawl

spaces of Building 101 and 104 are individually insulated steel pipes. Much of the insulation is believed to contain asbestos (HBA, 1997).

## 4.8 Transportation

### 4.8.1 Roadways and Traffic

#### 4.8.1.1 Transportation Network

The Forest Glen Annex of the WRAMC is served by an external roadway network comprised of local, collector, and arterial streets. The following is a description of the network (see Figure 1-1).

**Interstate 495 (the Capital Beltway):** This is an eight-lane circumferential freeway that surrounds Washington D.C. It provides connections to most major arterials and interstate roadways in the metropolitan area. Motorists using I-495 can access the Forest Glen Annex via interchanges at either Connecticut Avenue or Georgia Avenue. In the vicinity of the Forest Glen Annex, the speed limit is 55 mph and I-495 carries approximately 250,000 vehicles per day (vpd).

**Georgia Avenue (MD 97):** South of the Beltway, Georgia Avenue is a seven-lane major arterial serving north-south traffic between Washington D.C., Silver Spring, and their northern suburbs. During peak periods, Georgia Avenue operates under a reversible lane configuration with four lanes in the peak direction and three lanes in the off-peak direction. The speed limit on Georgia Avenue is 35 mph. In the vicinity of the Capital Beltway and Seminary Road, Georgia Avenue carries approximately 75,000 vpd.

**East-West Highway (MD 410):** The East-West Highway is a major arterial located south of Forest Glen Annex and provides access to Brookville Road via Grubb Road (See Figure 1-1). In the vicinity of Grubb Road, this four-lane arterial has a posted speed limit of 35 mph and carries approximately 30,000 vpd.

**Seminary Road and Dale Drive (MD 391):** This four-lane, east-west, divided arterial carries approximately 14,000 vpd on the west side of Georgia Avenue near the Forest Glen Annex. Seminary Road changes its name at Georgia Avenue and becomes Dale Drive. Seminary Road intersects with Linden Lane approximately ¼-mile west of Georgia Avenue and provides direct access to the Forest Glen Annex. Seminary Road also intersects with Brookville Road and provides access to Forest Glen Annex from the southeast.

**Brookville Road:** This minor arterial runs northeast-southwest and forms the southern boundary of Forest Glen Annex. In the vicinity of Forest Glen Annex, Brookville Road is a four-lane divided roadway with a flush left turn-lane in the median. Brookville Road serves area commuter traffic as well as local industrial land uses in the vicinity of Forest Glen Annex.

Primary circulation within Forest Glen Annex is served from two main roadways, Linden Lane and Steven Sitter Avenue, which intersect just south of the Historic District.



**Linden Lane:** This two-lane roadway serves east-west traffic and is the only roadway that provides continuity through the post. West of Steven Sitter Avenue, Linden Lane is 24 feet wide, with curb and gutter, and is in good overall condition. East of Steven Sitter, the roadway narrows to 20-22 feet wide, with grass shoulders and utility poles and other obstructions located within several feet of the paved roadway. Between Woodstock Avenue and New Castle Avenue the horizontal and vertical alignments of Linden Lane are only suitable for very low operating speeds and the pavement is in poor condition. This section is posted with an advisory speed limit of 15 mph. According to a 1990 Transportation Study completed for Forest Glen Annex, Linden Lane carries 4,600 vpd.

**Steven Sitter Avenue:** This north-south, two-lane roadway varies from 20 to 24 feet wide and provides access to the post at Brookville Road. The roadway is physically in good condition with a posted speed limit of 25 mph.

**Historic District Roadways:** Primary access to the Historic District is via Linden Lane. Narrow one-way roadways and low underpasses limit circulation within the district itself. The roadway system within the Historic District is not well delineated and is suitable to serve a “driveway” function for direct delivery to and from the facilities within the Historic District. Currently, all driveways to and from the Historic District are blocked at Linden Lane and entry is prohibited.

Traffic operations in and around the Historic District can be characterized by analyzing several key intersections. Below is a description of key internal and external intersections analyzed for this study. See Figure 4-5 for a summary of existing lane arrangements and traffic control at key intersections.

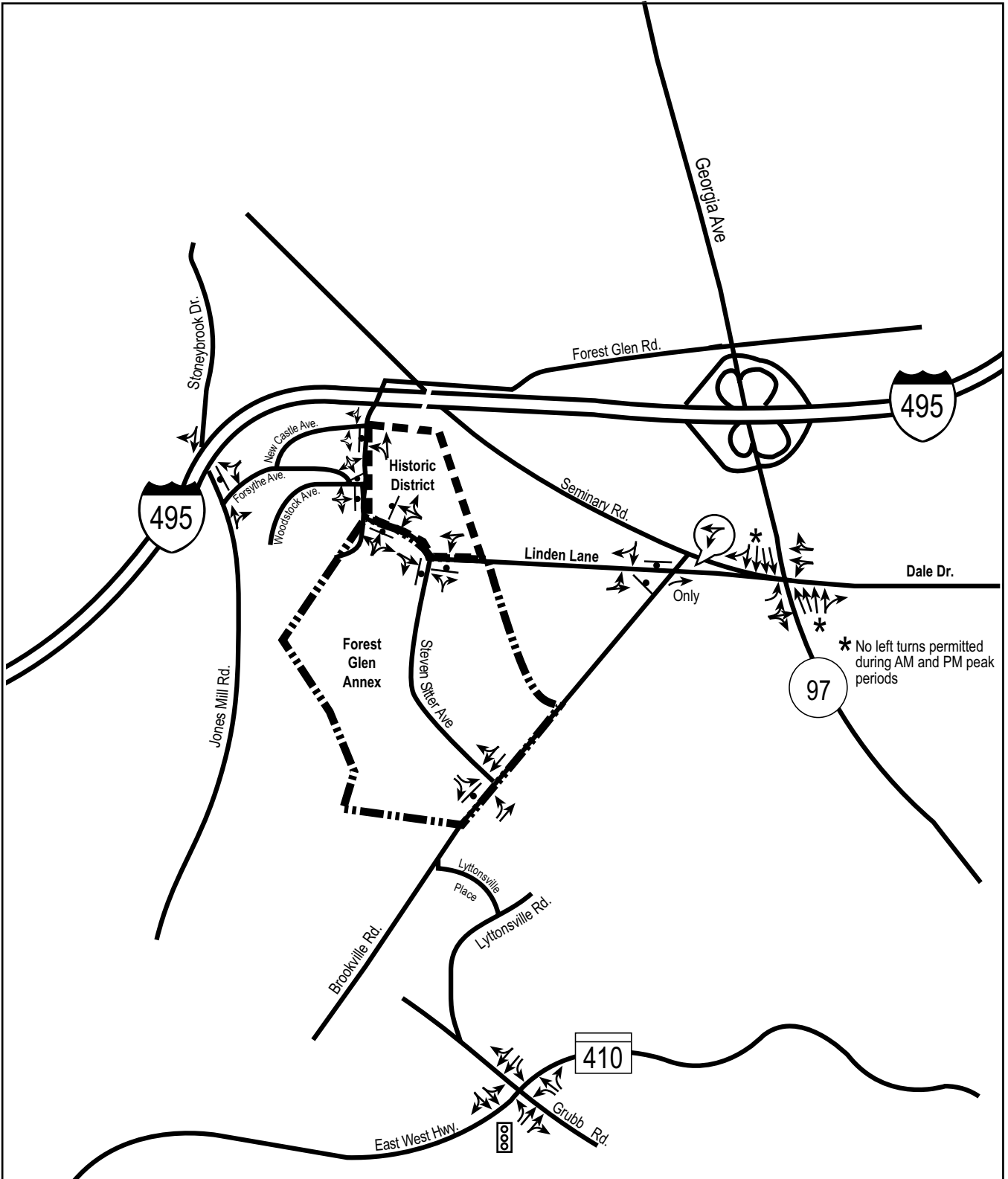
**Steven Sitter Avenue and Brookville Road:** This intersection provides access to and from Forest Glen Annex near the new WRAIR Facility. Steven Sitter Avenue ends in a T-intersection with Brookville Road. The Steven Sitter Avenue approach is stop-controlled with a single shared right and left turn lane.

**Steven Sitter Avenue and Linden Lane:** This T-intersection is located in the center of the post and represents the “crossroads” of the internal roadway network. Steven Sitter Avenue ends at Linden Lane and traffic must turn left or right from the Steven Sitter Avenue onto Linden Lane.

This intersection was recently reconstructed, to improve the skewed angle and to remove turn restrictions from Linden Lane and Steven Sitter Avenue. The newly constructed Steven Sitter Avenue approach intersects with Linden Lane at nearly 90 degrees and all turning movements are now possible at the T-intersection. The Steven Sitter Avenue approach is stop controlled, with one right-turn lane and one left-turn lane.

The eastbound Linden Lane approach is one shared through and right-turn lane and is stop-controlled. The westbound Linden Lane approach consists of one free-flow through lane and one exclusive left-turn lane.

**Linden Lane and Woodstock Avenue:** This intersection is located in the northern portion of the post, in the Historic District. Woodstock Avenue ends at Linden Lane and forms a T-intersection. Each approach leg of the intersection is one lane. This intersection is stop-



Legend

- Historic District
- . - Forest Glen Annex
- ↗ Lane Arrangements
- Stop Sign
- ⓧ Traffic Signal

Not to Scale



Figure 4-5  
EXISTING TRAFFIC CONTROL AND  
LANE ARRANGEMENTS  
NPSHD, Forest Glen Annex  
Walter Reed Army Medical Center

controlled on the northbound Linden Lane approach and the eastbound Woodstock Avenue approach.

Other external intersections in the area that may be affected, depending on the magnitude of the reuse plans include:

**Georgia Avenue and Seminary Road:** This intersection, located south of the Capital Beltway, handles very heavy traffic volumes during the peak periods. Georgia Avenue is a seven-lane facility which operates in a 4-3 reversible lane configuration during the peak periods (four-lanes southbound during the morning peak and four-lanes northbound during the evening peak). Left turns from Georgia Avenue are prohibited during peak periods. The intersection is controlled by a signal.

**Linden Lane and Brookville Road:** Linden Lane and Brookville Road are both are two-lane collector roads at this intersection. The southbound approach on Brookville Road is one way. Eastbound right turns from Linden Lane and northbound left turns from Brookville Road are prohibited.

**Grubb Road and East-West Highway:** This intersection is located south of the post and west of Georgia Avenue. East-West Highway is major arterial with two through lanes in each direction and exclusive left turn lanes on the east and west approaches to the intersection. The intersection is controlled by a traffic signal.

#### 4.8.1.2 Access

There are three main access points to the Forest Glen Annex from off-post. Access from the north is via Linden Lane at the bridge over the Capital Beltway. Access from the west is through the Forest Glen Park neighborhood on either New Castle Avenue or Woodstock Avenue. Access from the east is via Linden Lane, through the Linden neighborhood and a small industrial area, near the CSX railroad crossing. Access from the south is via Steven Sitter Avenue. These access points are not patrolled and do not have controlled gates.

#### 4.8.1.3 Traffic Volumes and Level of Service

The traffic data used to determine the existing conditions is based on recent, existing 1997-1998 data provided by Montgomery County Traffic Safety and Investigations Unit, the Montgomery County Department of Park and Planning, and from a 1990 Transportation Study prepared for the U.S. Army Corps of Engineers, Baltimore District.

A comparison of 1990 and 1998 peak-hour turning movement counts taken at the intersection of Steven Sitter Avenue and Linden Lane near the Forest Glen Annex Historic District indicate that traffic volumes on Linden Lane have decreased by more than 15 percent over the past 8 years. Similarly, traffic volumes on Steven Sitter Avenue have also dropped from 1990 levels.

In an urban area such as the vicinity of Forest Glen Annex, characterized as densely developed and almost completely built-out, the overall traffic flow and level of service is typically controlled by operations and delay at key intersections within and surrounding the study area. Traffic operations were characterized using planning procedures (Critical Lane Volume Method) to estimate the peak-hour Level of Service (LOS) at key intersections.

Figure 4-6 summarizes the existing peak hour and traffic volumes and the existing LOS at locations where current traffic data are available.

LOS is defined in the *1994 Highway Capacity Manual* (HCM) as a qualitative measure describing the operational conditions within a traffic stream and how motorists perceive the conditions. LOS is described using a number of different measures of effectiveness, including travel speed, density of vehicles, freedom to maneuver, delay comfort, and safety. The LOS of a roadway or intersection will fall into one of six categories, A through F. LOS A represents the best operating condition, with little or no delay; LOS F represents the worst condition, which is a facility operating under forced-flow conditions with standing queues and stop-and-go conditions.

Under today's conditions, a facility operating at LOS D and sometimes LOS E during peak periods is considered acceptable in urbanized areas. The M-NCPPC, the agency that oversees growth in the county, identifies capacity as LOS E in the area of Forest Glen Annex. The Military Traffic Management Command recognizes LOS C as acceptable operation.

The internal intersections located on the post operate very well at LOS A during the morning and evening peak periods. The intersection of Georgia Avenue and Seminary Road is very congested during the morning and evening peaks and operates at or over capacity.

#### 4.8.1.4 Parking

On the basis of the 1990 Transportation Study, there are approximately 119 parking spaces within the NPSHD. In addition, there are several unmarked paved areas that are being used for parking. The 1990 study found that the overall parking utilization rate was 55.8 percent in the Forest Glen Annex. This rate is considered low and indicates that abundant parking was available to serve the existing needs. A new parking facility has been built on Stephen Sitter Avenue to serve the new WRAIR building.

#### 4.8.2 Railways

There are no rail facilities within the Forest Glen Annex section. The main line of the CSX freight rail system parallels the eastern boundary of the installation. However, service is not provided to WRAMC.

#### 4.8.3 Aviation

Air access is available via rotary-wing aircraft, using a 40-foot by 60-foot helicopter landing pad with lights for night operations. The helicopter pad is located south of the softball fields. The nearest commercial airports are Baltimore-Washington International (BWI)

Airport in Anne Arundel County, Maryland and Reagan National Airport, in Arlington County, Virginia. Andrews Air Force Base in Prince George's County, Maryland, provides air cargo and military transportation.

#### 4.8.4 Public Transit

An extensive network of public transportation services serves the Forest Glen Annex. The network includes regional Washington Metropolitan Area Transit Authority (WMATA)

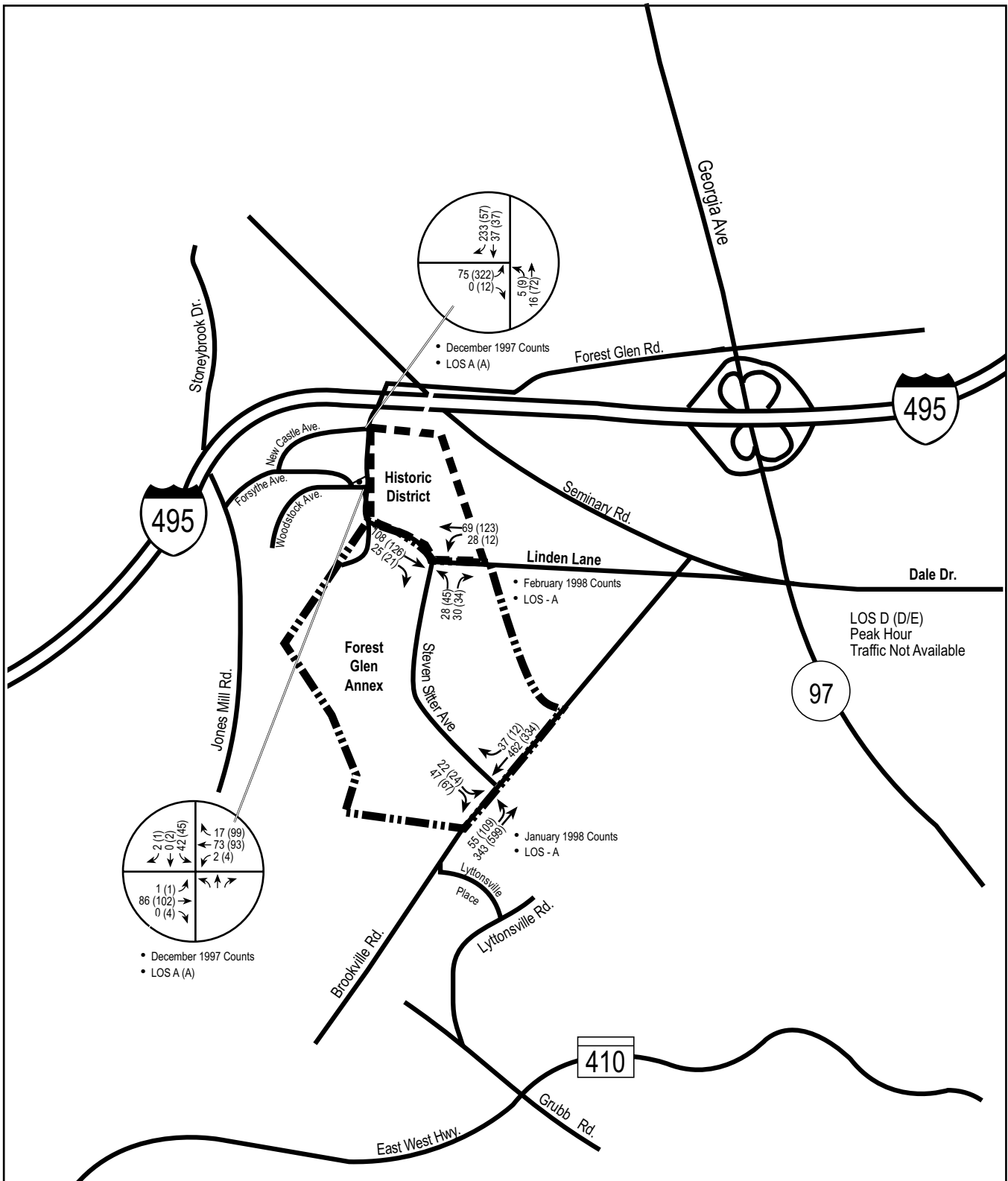


Figure 4-6  
EXISTING PEAK HOUR TRAFFIC AND  
LEVEL OF SERVICE  
NPSHD, Forest Glenn Annex  
Walter Reed Army Medical Center

Metrorail service at the Forest Glen Station and Silver Spring stations; several WMATA Metro bus routes along Georgia Avenue; and “Ride-On” local bus service, operated by Montgomery County’s Department of Transportation.

The Ride-On Route 4 directly serves Forest Glen Annex via Linden Lane. This route connects Forest Glen Annex with the Maryland Rail Commuter (MARC) commuter rail system at the Kensington Station and WMATA Metrorail service at the Silver Spring Station. During peak periods, the Ride-On bus also serves the Grosvenor Metro Station. The bus stops along Linden Lane near the Thrift Shop (Building 136 on Parcel 3) and at Woodstock Avenue. All of the vehicles assigned to this route are lift-equipped to facilitate their use by disabled individuals.

The closest regional Metrorail service is at the Forest Glen Station, located within 1 mile of Forest Glen Annex near the intersection of Georgia Avenue and Forest Glen Road, just north of the Capital Beltway. Employees using this station must board the No. 5 Ride-On bus to the corner of Linden Lane and Second Avenue and then transfer to the No. 4 bus for direct service to Forest Glen Annex. Alternatively, employees may use the slightly more distant Silver Spring Metrorail station (on Colesville Road between East-West Highway and Second Avenue) and board the No. 4 Ride-On bus for direct service to Forest Glen Annex.

Longer distance public transportation is provided by the MARC Commuter Train Service, operated by the Mass Transit Administration of the Maryland Department of Transportation, and by AMTRAK’s regional and national train service.

MARC’s Brunswick- to-Washington/Union Station line uses the CSX mainline tracks, which run along the eastern boundary of Forest Glen Annex. The nearest MARC stations are located in Kensington to the north and Silver Spring (also the Metrorail station) to the south.

The nearest AMTRAK service is from Union Station in Washington, D.C., which can be accessed via Metrorail. National and BWI airports are also accessible from the Forest Glen Annex via Metrorail.

WRAMC also operates its own internal shuttle service between Forest Glen Annex and the Main Section in the District of Columbia. This service operates Monday through Saturday, with no service on Sundays or holidays. Ridership is limited to persons with a valid DOD identification.

## 4.9 Hazardous and Toxic Materials

In order to evaluate the status of hazardous and toxic materials at the NPSHD and Forest Glen Annex, the following reports were reviewed:

- Asbestos Survey and Assessment of Building 120 - Boiler Plant, Beach Drive, Forest Glen Annex, Walter Reed Army Medical Center (General Physics Corporation, November 1998)
- PCB Survey of Building 120 - Boiler Plant, Beach Drive, Forest Glen Annex, Walter Reed Army Medical Center (General Physics Corporation, November 1998)

- Lead-Based Paint Survey and Assessment of Building 120 - Boiler Plant, Beach Drive, Forest Glen Annex, Walter Reed Army Medical Center (General Physics Corporation, November 1998)
- Pigeon Excrement Survey of Building 120 - Boiler Plant, Beach Drive, Forest Glen Annex, Walter Reed Army Medical Center (General Physics Corporation, November 1998)
- Modified Phase I Environmental Site Assessment of Building 120, Walter Reed Army Medical Center, Forest Glen Annex (General Physics Corporation, November 1998)
- Addendum to Modified Phase I Environmental Site Assessment of Building 120, Walter Reed Army Medical Center, Forest Glen Annex (General Physics Corporation, January 1998)
- Asbestos Survey Report for Walter Reed Army Medical Center, Forest Glen Annex (EA Engineering, Science and Technology, September 1998 Draft)
- Tank Closure Report, UST Removals & Replacements, Forest Glen Annex, Buildings 511 & 178, Walter Reed Army Medical Center (Waste-Tron of Maryland, December 1997)
- Environmental Baseline Study for the Historic District of the Forest Glen Annex of Walter Reed Army Medical Center (CH2M HILL, 1996)
- Forest Glen Adaptive Reuse Study, Summary Report (EDAW, 1995)
- Lead-Based Paint Surveys at Quarters 110, 126, and 135 (Aerosol, 1995)
- Environmental Assessment for Excessing of the National Park Seminary Historic District (STV/Lyon, 1994)
- Master Plan Report for Walter Reed Army Medical Center, Forest Glen Section, Washington, D.C. (Astore, 1992)
- Concept Stormwater Management, Walter Reed Army Medical Center, Forest Glen Section (Kamber, 1991)
- Environmental Assessment, Revised Master Plan, Forest Glen Section, Walter Reed Army Medical Center (U.S. Army Corps of Engineers, 1990)
- Preliminary Report, Asbestos Assessment Survey Phase I for Buildings 106, 108, 109, 110, 111, 112, 113, 115, 126, 133, 135, and 139 (Dames & Moore, 1990)

These reports provide information on the presence of underground and aboveground storage tanks (USTs and ASTs, respectively), asbestos-containing material (ACM), electrical transformers containing polychlorinated biphenyls (PCBs), radon, lead-based paint, radiological materials, past spill sites, maintenance and waste-accumulation areas, and pathological waste.

A number of sites were identified that in the past contained, or currently contain, hazardous materials. Information on these sites is summarized in Table 4-3, which lists the hazardous-waste, radiological-waste, and solid-waste activities associated with each building. The lead-based paint surveys summarized in Table 4-3 were available for only a limited number of

**Table 4-3**  
**Summary of Environmental Conditions of Affected Buildings**

Building Number	Location	Building Use		Environmental Conditions						
		Former Use	Current Use	Asbestos	Lead-based Paint	Hazardous Substances/ Hazardous Materials	Radon Readings (pCi/L) <sup>a</sup>	Radiological Substances	Solid Waste	USTs/ ASTs
101	Parcel 1	"Ye Old Forest Inn" and additions - hotel, school, convalescent wards, administration	Unoccupied	Yes	Yes	No hazardous substances observed	0 - 2.7	None observed	Contains books, files, furniture, and debris	None
104	Parcel 1	Odeon - Theater and music hall	Part of structure burned down in 1993; remainder unoccupied	Yes	Not tested but suspect LBP	None	1 - 1.7	None	None	None
106	Parcel 1	American Bungalow - sorority house	Unoccupied	Yes	Not tested but suspect LBP	None	3.9	None	None	None
107	Parcel 1	Castle - sorority house	Unoccupied	Yes	Not tested but suspect LBP	None	No data	None	None	None
108	Parcel 1	Japanese Pagoda - sorority house	Lease to nonprofit group for administrative use	Yes	Sealed or otherwise removed	Assume small quantities of cleaning solutions and paints	0	None	None	None
109	Parcel 1	Japanese Bungalow - sorority house	Unoccupied	Yes	Not tested but suspect LBP	None	1.9	None	None	None
110	Parcel 1	Colonial House - sorority house	Unoccupied	Yes	Yes	None	0	None	None	None
111	Parcel 1	Dutch Windmill - sorority house	Unoccupied	Yes	Not tested but suspect LBP	None	0	None	None	None
112	Parcel 1	Indian Mission - sorority house	Unoccupied	Yes	Not tested but suspect LBP	None	No data	None	None	None
113	Parcel 1	Swiss Chalet - sorority house	Unoccupied	Yes	Not tested but suspect LBP	None	0	None	None	None
114	Parcel 1	Chapel	Unoccupied	Yes	Not tested but suspect LBP	None	1.4 - 1.8	None	None	None
115	Parcel 1	Library	Unoccupied	Yes	Not tested but suspect LBP	None	0	None	None	None
116	Parcel 1	Aloha House - President's home	Used to store office equipment, furniture, and boxes	Yes	Not tested but suspect LBP	None	1.2 - 1.9	None	None	None
118	Parcel 1	Gymnasium	Unoccupied	Yes	Not tested but suspect LBP	Unable to enter due to poor state of building; Assume no hazardous substances	0.7 - 1.6	Assume none	Gym equipment, furniture, and miscellaneous debris	None
119	Parcel 1	Villa - Residential structure	Unoccupied	Yes	Not tested but suspect LBP	None	0.6 - 1.3	None	Furniture, empty boxes, refrigerators, miscellaneous debris	None



**Table 4-3**  
**Summary of Environmental Conditions of Affected Buildings**

Building Number	Location	Building Use		Environmental Conditions						
		Former Use	Current Use	Asbestos	Lead-based Paint	Hazardous Substances/ Hazardous Materials	Radon Readings (pCi/L) <sup>a</sup>	Radiological Substances	Solid Waste	USTs/ ASTs
120	Parcel 1	Maintenance facility and maid's dormitory	Heating plant	Yes	Not tested but suspect LBP	Sulfuric acid, activated carbon, hardness buffer, phenolphthalein indicator for testing and treating water in boiler system; drums of water treatment material; rusted cans of paint	1.2 - 1.5	None observed	Observed storage of old, empty drums, cans, wood pallets, and other miscellaneous debris in 1996. WRAMC staff reports much of this has been removed since then.	An empty AST formerly used for heating oil; formerly 4 ASTs in an underground vault (removed in 1995); incident of fuel spill during loading of AST; a vault had formerly held 4 12,000-gallon ASTs
121	Parcel 1	Carriage (fire) house	Fire house	Yes	Not tested but suspect LBP	Assume small quantities of cleaning solutions	1 - 1.4	None observed	General office/municipal-style waste	None
122	Parcel 1	Carpenter shop	Unoccupied	Yes	Not tested but suspect LBP	None	0.9 - 1.6	None	None	None
125	Parcel 1	Stables	Leased for use as a homeless shelter	Yes	Not tested but suspect LBP	Assume small quantities of cleaning solutions	No data	None	General municipal-style waste	None
126	Parcel 1	Residence	Unoccupied	Yes	Yes	None	4.4	None	None	None
133	Parcel 1	Residence	Unoccupied	Yes	Not tested but suspect LBP	None	2.1	None	None	Reportedly had a 275-gallon ASTs for fuel oil. No tank found.
135	Parcel 2	Chauffeur's cottage	Unoccupied	Yes	Yes	None	6.6	None	General municipal-style waste	Reportedly had a 275-gallon ASTs for fuel oil. No tank found.
136	Parcel 3	Carpenter's quarters	Thrift shop	Yes	Not tested but suspect LBP	None	1.1	None	General municipal-style waste	None
138	Parcel 1	Servants' quarters	Used to store boxes and miscellaneous debris	Yes	Not tested but suspect LBP	None	1.1 - 1.7	None	Used to store office equipment	None
139	Parcel 2	Engineer's cottage	Unoccupied	Yes	Not tested but suspect LBP	None	3.3	None	None	None
144	Parcel 1	Valve house	Unoccupied	Yes	Not tested but suspect LBP	None	No data	None	None	None

**Table 4-3**  
**Summary of Environmental Conditions of Affected Buildings**

Building Number	Location	Building Use		Environmental Conditions						
		Former Use	Current Use	Asbestos	Lead-based Paint	Hazardous Substances/ Hazardous Materials	Radon Readings (pCi/L) <sup>a</sup>	Radiological Substances	Solid Waste	USTs/ ASTs
149A	Parcel 1	Root Cellar	Storage for hazardous-response materials used by the Fire Dept. (e.g., absorbents, overpack drums)	Not tested but suspect ACM	Not tested but suspect LBP	Has previously stored hazardous materials. Currently, no hazardous materials are stored in this structure.	No data	None. Formerly used for temporary storage of radioactive materials. Found to be free of residual radioactive contamination in 1997 decommissioning survey.	None	None
160	Parcel 1	Transformer vault	Transformer vault	Not applicable	Not tested but suspect LBP	None	No data	None	None	None
178	Parcel 3	Service building	Warehouse	Not tested, but suspect ACM	Not tested but suspect LBP	Receives and temporarily stores expired/potentially expired pharmaceuticals. Stores empty/partially empty compressed gas cylinders.	0.8 - 2.1	None	Boxes and general office waste	1,000-gallon UST for generator fuel installed in 1997.
179	Parcel 3	Salt storage	Salt storage	Not tested, but suspect ACM	Not tested but suspect LBP	None	No data	None	None	None
185	Parcel 1	Medical Research	Administration and office facility	Yes	Not tested but suspect LBP	None	No data	None	General office waste	None
186	Parcel 1	Medical Research	Administration and office facility	Yes	Not tested but suspect LBP	None	3.2	None	General office waste	None
187	Parcel 1	Medical Research	Administration and office facility	Not tested, but suspect ACM	Not tested but suspect LBP	None	1.6 - 2.4	None	General office waste	None
188	Parcel 1	Medical Research	Armed Forces Pest Management Board - office facility	Yes	Not tested but suspect LBP	Small amounts of pesticides are received for evaluation for proposed use.	2.2	None. Formerly received and tested radioactive materials; generated low-level radioactive wastes from wipe testing. Found to be free of residual radioactive contamination in 1997 decommissioning survey.	Produces small amount of solid waste from office activities; waste includes paper.	None.

**Table 4-3**  
**Summary of Environmental Conditions of Affected Buildings**

		Building Use		Environmental Conditions						
Building Number	Location	Former Use	Current Use	Asbestos	Lead-based Paint	Hazardous Substances/ Hazardous Materials	Radon Readings (pCi/L) <sup>a</sup>	Radiological Substances	Solid Waste	USTs/ ASTs
189	Parcel 2	Medical Research (military psychiatry - sleep deprivation)	Vacant and scheduled for demolition	Yes	Not tested but suspect LBP	Various substances including ethanol, acetone, collodion, corrosive materials and drugs used in medical research. Also has a tank of liquid nitrogen.	1.5 - 2.4	None	Generated biological waste from blood samples, disposed of as infectious waste at WRAMC's Main Section; general office waste	None

<sup>a</sup> Radon: pCi/L = picoCuries per liter. Values greater than 4 pCi/L exceed EPA guidelines. Source of data: Walter Reed Radon Reduction Program database, 1990-1991.

buildings. As Table 4-3 indicates, some buildings are suspected of containing lead-based paint because of the age of the structure and, in some cases, visual observations.

The locations of the buildings listed in Table 4-3 are shown in Figure 4-7, which focuses on the Historic District and its immediate vicinity. Additional information about these environmental conditions is provided in the following subsections.

#### **4.9.1 Environmental Baseline Study**

Under DOD and Army guidance governing property disposal, including AR 405-90 and Department of the Army Pamphlet (DA PAM) 200-1 (October 1998), an Environmental Baseline Study (EBS) is prepared to support proposed real property transactions (acquisition, transfer, and leasing). An EBS is a study of environmental conditions of Army-controlled properties (or proposed acquisitions), which focuses on hazardous substances or other regulated hazards. The Army uses an EBS to determine whether or not the property poses a hazard to human health or the environment. An EBS is required for properties being reported to GSA for screening and disposal and it becomes part of the Report of Excess.

An EBS was prepared in 1996, that covered both the NPSHD and the additional parcels, which are once again being considered for excessing along with the NPSHD (CH2M HILL, 1996). To prepare the EBS, information was obtained from reviewing the 1990 through 1995 reports and was supplemented by onsite reconnaissance, review of records, and interviews with WRAMC staff in 1995. The information presented in the 1996 EBS was subsequently updated, for the purposes of this EA, by reviewing reports prepared in 1997 and 1998 and through telephone interviews and additional site visits in 1998 and 1999.

Because of the time elapsed between preparation of the 1996 EBS and the current proposed action, both the EBS and this EA must be considered together, along with the reports cited in this section, in determining the proper type of notification and remediation (if required) that are needed for the proposed transfer of the NPSHD and the additional parcels, in accordance with AR 405-90 and DA PAM 200-1.

Both the 1996 EBS and this EA will be attached to the Report of Excess that will be sent to GSA.

#### **4.9.2 Hazardous Materials Storage and Handling Areas**

Routine operations at the Forest Glen Annex generate hazardous and toxic materials. These operations generally are small-scale and generate only limited quantities of waste materials. WRAMC staff account for the quantities of oil and gas used throughout the Forest Glen Annex, the materials used at Building 503 (the new WRAIR facility), and the materials and wastes processed at Building 515. WRAMC staff complete the required hazardous-waste generation reports, which document the type and quantity of hazardous material generated and disposed of. The reports also document the companies that transport and dispose of the hazardous materials.

Building 120, the heating plant, contains chemicals and miscellaneous substances that are used for testing and treating the water in the boiler and heating system. The testing room is used to store various substances, including sulfuric acid, activated carbon, phenolphthalein indicator, and hardness buffer that are used for testing the boiler water. All of the substances are stored together in a wooden cabinet.

At the time of a site inspection for the EBS in 1995, a storage cabinet in Building 120 contained approximately 12 cans of paints. Most of the paint cans were rusted and in poor condition. Drums of material used to treat boiler water were observed to be stored on pallets. Powdery material from the drums was observed on top and around many of the drums. Since that time, Environmental Division staff report that most of the old, unused materials that were stored in Building 120 have been removed (Sanders, personal communication, 8/6/99). However, three unidentifiable containers were noted in the lower level (General Physics Corporation, 1998e). Water from the boiler system in Building 120, which was observed discharging to a drainage ditch at the time of the EBS, now runs through a pipe that empties into a sewer drain.

In the past, the warehouse (Building 178) in Parcel 3 was used to receive and store corrosive and flammable materials, compressed-gas cylinders, medical supplies, furniture, and miscellaneous materials for the WRAMC facility. The warehouse had separate rooms for segregating materials that are corrosive (including phenol, acids, ammonia, and chloroform) and flammable (including alcohol, xylenes, paints, and stains). The warehouse also received tanks of compressed gases, including oxygen, carbon dioxide, helium, argon, and acetylene; the tanks were segregated according to flammability.

Currently, Building 178 receives and temporarily stores expired or potentially expired pharmaceuticals. Most of the other supplies currently stored in the warehouse are standard medical and surgical supplies, such as tubing and gauze, as well as empty or partially empty gas cylinders (Sanders, personal communication, 8/6/99).

Until 1995, Building 188 in the NPSHD contained tanks of compressed gas, such as nitrogen, argon, and methane, and tanks of liquid nitrogen that were used in the testing process. Now the building only receives and stores small amounts of pesticides that are submitted for evaluation to the Armed Forces Pest Management Board, which has offices in Building 188.

Small amounts of materials used in medical research are stored in Building 189 in Parcel 2, including ethanol and blood samples. No research into blood-borne diseases is conducted in Building 189 (Sanders, personal communication, 8/6/99). In the past, although Building 189 (known as the "Sleep Lab") was used primarily for military psychiatric research into sleep deprivation, a variety of drugs and toxic or hazardous materials were reportedly used and stored in the building, including acetone, vacuum fluids, corrosive materials, cyanide green, and atropine (Porter, personal communication, 10/14/99).

Building 189 is in the process of being vacated, with its activities moving into the new WRAIR building, and is scheduled for demolition in the first quarter of FY 2000. The current plan is to level the building and leave the foundation. The interior of Building 189 will be sampled for residual contamination before it is demolished.



**LEGEND**

--- HISTORIC DISTRICT BOUNDARY

... ADDITIONAL PARCELS BEING CONSIDERED FOR EXCESSING

(SEE TABLE 4-3 FOR BUILDING INFORMATION)

Figure 4-7  
BUILDINGS WITH  
ENVIRONMENTAL CONDITIONS  
NPSHD, Forest Glen Annex  
Walter Reed Army Medical Center

Hazardous waste that is generated at the WRAMC facility is temporarily stored in Building 515, located about one-half mile south of the NPSHD. An outside contractor transports the hazardous wastes from the Forest Glen Annex for disposal.

### 4.9.3 Underground and Aboveground Storage Tanks

Available data about the only UST that is in the immediate vicinity of the NPSHD is provided in Table 4-4. This UST, which is made of fiberglass-reinforced plastic, is located behind the warehouse on Parcel 3. The tank was installed in 1997, in a pit formerly occupied by an older (1980) UST. The former tank was removed by a certified tank remover and the site was closed by MDE (Waste-Tron, 1997).

TABLE 4-4  
Underground Storage Tank List

Tank Number	Building Number	Tank Capacity (Gallons)	Purpose of Tank	Year Installed	Tank Type
9	178	1,000	General	1997	FRP

Note: FRP = Fiberglass-reinforced plastic

A review of records for the EBS found that, before 1995, four storage tanks for heating oil were located in an underground vault adjacent to Building 120. One of the tanks was removed in September 1994 and the three remaining tanks were removed in September 1995, after the heating system in Building 120 was converted to natural gas. During the November 1995 site reconnaissance for the EBS, the underground vault that had contained these tanks was not observed because the structure was locked. The preliminary draft environmental assessment (STV/Lyon, 1994) stated that the underground vault had no drains and that these had been the only USTs in the NPSHD itself.

Building 120 was surveyed for ASTs in 1998 (General Physics Corporation, 1998e). Three abandoned ASTs were found on the south side of the building, but likely were removed from elsewhere and were being stored at this location. An empty tank labeled "Diesel Fuel" was noted along the east wall tank room/east truck bay, with odors and stains present below the AST. Another AST labeled "Diesel Fuel" was found in the tank room; the AST was partially full and in service providing fuel to an auxiliary generator.

Previous documents reported that Buildings 133 and 135 may have had 275-gallon ASTs for fuel oil. Both structures were used for residential housing in the past and are now vacant. A waste-site report that was prepared by the Army (STV/Lyon, 1994) indicated that the tanks at Buildings 133 and 135 did not have the required curbing or containment structures. However, no ASTs were visible at Buildings 133 and 135 during exterior inspections of the structures in 1995 and in 1999 and no tanks at these locations are listed in the installation's tank database (Sanders, personal communication, 8/6/99). In addition, while occupied, these houses were reportedly heated by steam heat from the Power Plant (Mitchell, personal communication, 10/12/99).

## 4.9.4 Asbestos, Lead-Based Paint, Radon, and Polychlorinated Biphenyls

### 4.9.4.1 Asbestos

Several asbestos surveys that were conducted for the site were reviewed for the EBS (CH2M HILL, 1996). The inventory of ACM identified in the surveys is summarized in the EBS. The EBS noted that signs were posted in Building 120 stating that ACM remained in the building and that the ACM-insulated pipes in the boiler room appeared to be in good condition, but no other details were available on the location, nature, or condition of the material. In addition, the environmental assessment for the Revised Master Plan dated September 26, 1990 (U.S. Army Corps of Engineers), indicated that Building 189 had ACM in the utility system. The ACM survey was not available for Building 189 when the 1996 EBS was prepared.

The ACM in Building 120 was surveyed and assessed again in 1998 (General Physics Corporation, 1998a). Approximately two-thirds of the samples collected for analysis contained either friable or non-friable asbestos. Asbestos was detected primarily in the insulation of steam and water lines but also in wall board, floor tiles, and roofing debris. Generally, the ACM was damaged and in poor condition. The survey recommended that the risks of exposure to employees be assessed, that further deterioration of ACM be prevented, and that ACM insulation on thermal systems (especially steam and water line insulation) be removed by a licensed contractor.

In 1998, ACM in 50 buildings at Forest Glen was surveyed (EA, 1998). The survey included most of the buildings in the NPSHD; Buildings 127, 179, and 187 were not included in the survey. Table 4-5 contains a summary of the information reported from the survey.

According to WRAMC staff (Sanders, personal communication, 5/25/99), the ACM that were identified as positive in these surveys have not been abated to date.

### 4.9.4.2 Lead-Based Paint

Three housing structures were surveyed before the EBS to determine the presence of lead-based paint. Table 4-6 lists the locations where paint was determined to contain lead, as discussed in the surveys. The EBS reported that the lead-based paint identified in those surveys had not been abated to date.

In spring 1999, lead-based paint was removed from the exterior and parts of the interior of the Japanese Pagoda (Building 108) to make way for renovation. In addition, some parts of Building 101 were abated. All lead-based paint debris was bagged and disposed of, as hazardous waste, at a properly licensed offsite facility (Sanders, personal communication, 8/6/99). The temporary measure of sealing was used on some windows and the columns in the Chapel (Building 114).

In 1998, lead-based paint in Building 120 was surveyed and assessed. Approximately one-fourth of the samples collected contained lead at a concentration above 0.7 milligrams per square centimeter, the regulatory limit set by MDE, although the results of the survey were qualified with a statement that negative results may not necessarily mean that there is no lead-based paint present. Lead-based paint was detected on both interior and exterior surfaces. The conclusions of the survey and assessment were that: the good condition of the



exterior painted surfaces led to little risk; the poor condition of the interior surfaces led to a moderate risk; the interior surfaces should be repaired, stabilized, or repainted; and an operations and maintenance program should be initiated to prevent activities from disturbing the surfaces covered with lead-based paint (General Physics Corporation, 1998c).

#### 4.9.4.3 Radon

The radon potential at the Forest Glen Annex is moderate, according to the U.S. Geological Survey Internet site that provides information on radon potential (USGS, 1995, and Gunderson et al., 1988). A moderate radon potential means that approximately one-half of the homes and buildings in the area have more than 4 picoCuries per liter (pCi/l) of air of radon. A value of 4 pCi/l has been defined by EPA as the health-based limit for radon exposure in air.

In a 1990 survey, radon levels were detected above the action limit of 4 pCi/L in NPSHD Buildings 108, 111, 110, 113, 115, 126, and 135. When these buildings were re-tested in 1991, however, radon levels above the action limit were detected only in Buildings 135 and 126. More recent radon monitoring data is not yet available (Pemiton Gregory, personal communication, 8/10/99). Radon mitigation systems consisting of basement fans and venting were installed in the buildings that were occupied as residences at the time. Fans are still operating in Buildings 115 and 126. WRAMC'S draft Radon Management Plan provides guidance on how radon should be controlled in existing and new buildings (WRAMC, 1999).

#### 4.9.4.4 Polychlorinated Biphenyls

The EBS reported that transformers exist within the property boundaries. According to the preliminary draft environmental assessment (STV/Lyon, 1994), 5 pad-mounted and 67 pole-mounted transformers existed at the Forest Glen Annex. Two new pad-mounted transformers (reportedly less than 6 months old) were observed behind Building 114 in a 1999 site visit. For the EBS, Forest Glen Annex staff stated that all PCBs at concentrations greater than 500 parts per million (ppm) had been removed from the transformers and replaced with non-PCB-containing mineral oil. Transformers that contained between 50 and 500 ppm of PCBs were removed in the federal fiscal year 1996. No staining of soil or other indications of a release of PCBs were observed during the site reconnaissance performed for the EBS.

In 1998, Building 120 was surveyed for PCB-containing fluorescent light ballasts (General Physics Corporation, 1998b). Approximately three-quarters of the light ballasts found in the building were assumed to be PCB-containing. No leaks were found in any of the ballasts, and no other electrical equipment potentially containing PCBs was found in the building. The survey recommended that the ballasts be inspected periodically to detect any leakage, spent ballasts be stored in the proper manner, PCB-containing ballasts be removed before the fixtures are disposed of, and PCB-containing ballasts be disposed of properly as hazardous waste.

In the 1998 survey of Building 120, a transformer on a concrete pad was observed to the northwest of Building 120, on the west side of Beach Drive. The transformer reportedly was removed from Building 118 and temporarily placed in this location and was not in service

**Table 4-5**  
**Summary of 1998 Asbestos Survey**

<b>Building Number</b>	<b>Primary Types of Asbestos-Containing Material</b>	<b>Friable Material?</b>	<b>Condition</b>	<b>Percent of Asbestos</b>
101	Floor tile, tile mastic, tank and pipe insulation, transite panels	Generally nonfriable to moderately friable	Good to significantly damaged	Generally not detected to 15 %
104	Floor tile, tile mastic	Low to high friability	Good	Generally not detected to 10 %
106	Pipe insulation, floor tile, tile mastic	Generally nonfriable to moderately friable	Mostly good	Generally not detected to 5 %
107	Plaster	Generally moderately friable	Good	Not detected
108	Vinyl sheeting, floor tile, plaster	Generally nonfriable to low friability	Good	Generally not detected to 20 %
109	Vinyl sheeting, plaster	Generally low to high friability	Good	Generally not detected to 15 %
110	Vinyl sheeting, sheeting mastic, plaster	Generally nonfriable to low friability	Good	Generally not detected to 10 %
111	Floor tile, plaster	Generally low to high friability	Good	Generally not detected to 2 %
112	Floor tile, mastic tile, pipe insulation	Generally low to high friability	Damaged to good	Generally not detected to 2 %
113	Vinyl sheeting, floor tile, plaster	Low friability	Good	Generally not detected to 5 %
114	Pipe insulation, plaster	Generally nonfriable to moderately friable	Significantly damaged to good	Not detected
115	Tile mastic, plaster, floor tile	Generally low to high friability	Good	Generally not detected to 5 %
116	Plaster, floor tile, tile mastic, vinyl sheeting	Mostly low friability	Good	Generally not detected to 6 %
118	Floor tile, tile mastic, plaster	Generally nonfriable to moderately friable	Damaged to good	Generally not detected to 10 %
119	Pipe and tank insulation, floor tile, vinyl sheeting, tile mastic	Generally nonfriable to high friability	Damaged to good	Generally not detected to 35 %
120	Floor tile, tile mastic, pipe and tank insulation, transite panels,	Generally low to high friability	Significantly damaged to good	Generally not detected to 20 %
121	Pipe insulation, floor tile, tile mastic	Generally low to high friability	Damaged to good	Generally not detected to 20 %
122	Sink insulation, floor tile	Generally low to high friability	Damaged to good	Generally not detected to 2 %
125	Floor tile, tile mastic, transite siding	Generally nonfriable to moderately friable	Good	Generally not detected to 20 %
126	Pipe insulation	Generally low to moderate friability	Damaged to good	Generally not detected to 10 %
133	Floor tile, tile mastic, pipe insulation, plaster	Generally low to high friability	Damaged to good	Generally not detected to 2 %
135	Pipe insulation, floor tile	Generally low friability	Good	Generally not detected to 20 %
136	Pipe insulation, floor tile	Generally nonfriable to moderately friable	Damaged to good	Generally not detected to 13 %
138	Floor tile, tile mastic	Generally low to high friability	Damaged to good	Generally not detected to 5 %
144	Tar, roofing	Low friability	Significantly damaged	Not detected
160	Transite panels	Nonfriable	Good	Not tested
185	Floor tile, tile mastic	Generally low to high friability	Damaged to good	Generally not detected to 2 %
186	Floor tile, tile mastic	Generally low to high friability	Good	Not detected to 7 %
188	Floor tile, tile mastic, pipe insulation	Generally nonfriable to moderately friable	Good	Generally not detected to 2 %
189	Floor tile, tile and carpet mastic, pipe insulation	Generally low to high friability	Damaged to good	Generally not detected to 40 %

**TABLE 4-6**  
Summary of 1995 Lead-Based Paint Survey

Building	Location	Condition	Percent Positive*
110	Plaster ceiling	A	20
	Window frame	A	71
	Window sill	A	68
	Window sash	A	75
	Door frame	A	50
	Door	A	39
	Radiator	A	27
	Baseboard	A	60
	Wall molding	A	100
	Spindle post	A	100
	Stair riser	A	100
	Stair carriage	A	100
	Stair stringer	A	100
	Crown molding	A	100
	Mantle	A	100
126	Window sash	B	50
	Window sill	B	40
	Window frame	B	60
	Baseboard	B	33
	Stair stringer white	B	50
	Door frame	B	50
	Entrance door	B	100
	Entrance door frame	B	100
	Closet trim	B	25
	Carriage white	B	100
	Newel white post	B	100
	Riser (brown)	B	100
	Bannister white	B	100
	Spindle white post	B	100
	Wall molding	B	100
	Door	B	38
	Drywall ceiling	B	100
135	Baseboard	B	75
	Plumbing pipe	B	60
	Door frame	B	74
	Door	B	62
	Window sill	B	67
	Window sash	B	78
	Window frame	B	74
	Wood ceiling	B	100
	Exterior wood siding	B	100
	Stringer post	B	50
	Bannister	B	100
	Stringer	B	100
	Attic hatch	B	100

\* Paint that tests greater than 15 percent positive for lead is considered a positive finding and the survey recommends that the paint be abated.

A = Paint was cracking, chipping, or peeling.

B = Paint showed some wear but was not cracking, chipping, or peeling.

(General Physics Corporation, 1998f). The transformer was observed in the same location in a 1999 site visit and was not in service. Reportedly, it contains non-PCB-containing mineral oil (Gregory, personal communication, 10/2/99).

#### **4.9.5 Pest Management**

Pest controllers on the Forest Glen Annex staff handle pest management.

#### **4.9.6 Radiological Materials**

WRAMC, WRAIR, and Armed Forces Institute of Pathology use radiological materials for clinical and medical research activities. WRAMC maintains a permit with the U.S. Nuclear Regulatory Commission (NRC) for using, storing, and handling radiological materials (NRC-Radioisotope Use, Storage, and Handling License number NRC-08-01738-025). The Health Physics Office at Forest Glen controls the use and storage of radioisotopes at WRAMC. They are handled according to a strict health and safety program to reduce the likelihood of releases. The NRC permit is written to cover the entire WRAMC facility, including both the Main Post and the Forest Glen Annex.

Two buildings (149-A and 188) in the NPSHD formerly were used to receive and temporarily store radioactive materials, but neither was individually listed on the NRC license, so an amendment to the license was not required when the buildings were decommissioned.

Building 149A (bunker) formerly was used for short-term storage of packages containing radiological material. No unsealed radioactive material was used in this building. In a 1997 decommissioning survey, the walls and floor of Building 149A and a storage refrigerator located in the building were directly surveyed for alpha, beta, and gamma contamination and wipe samples were analyzed. The building was found to be free of residual radioactive contamination and was removed from WRAMC's NRC permit (WRAMC Health Physics Office, 1997a). The building now is used solely for storing hazardous-response materials such as absorbents.

Until 1995, Building 188 was used as the Health Physics Office building and had a small radioanalysis laboratory area that received, temporarily stored and tested packages containing radiological materials that were used at other locations at WRAMC. The site reconnaissance during the EBS found that the radiological material was received and tested to determine if a leak had occurred during shipping. Testing included collecting smear and wipe samples of the packaging material and analyzing the samples to determine the presence of radioisotopes. The material that was received at Building 188, which included uranium, cobalt-60, and cesium-137, was stored temporarily in refrigerator units marked with "Radioactive Materials" labels. After testing, the material was transported from Building 188 for use at the Main Section or elsewhere at Forest Glen Annex. The receipt and distribution function is now performed at Building 515, outside the NPSHD.

In a 1996 decommissioning survey, the walls and floor of Building 188 were cleaned and directly surveyed for alpha, beta, and gamma contamination and wipe samples were analyzed. Ventilation hoods and sinks in the lab area, as well as the refrigerator and freezer used to store radioactive material packages, were cleaned and surveyed. The building was

found to be free of residual radioactive contamination (WRAMC Health Physics Office, 1997b). Building 188 is now used as administrative office space for the Armed Forces Pest Management Board.

## **4.9.7 Hazardous Waste Disposal**

### **4.9.7.1 Solid and Hazardous Waste**

There are no solid-waste landfills within the NPSHD, nor are there currently any solid-waste landfills on the Forest Glen Annex. Solid waste is transported from the site by Eastern Trans-Waste for disposal. The solid waste is collected in dumpsters and emptied by the contractor on a scheduled basis.

The preliminary draft environmental assessment (STV/Lyon, 1994) identified four former landfill sites at the Forest Glen Annex of WRAMC. The nearest former landfill is located several hundred feet south of the NPSHD. The landfill sites are inactive. No leachate or groundwater levels within 15 feet of the surface were noted and no groundwater sampling was recommended for the sites. Information concerning the closing of the landfills was not available for the EBS. One of the former landfill locations is the site of the commissary, laundromat, and service station.

Hazardous materials are labeled properly and stored at Building 515 (about one-half mile south of the NPSHD), in accordance with federal and state RCRA requirements, until they can be packed, transported, and disposed of at properly licensed off-post facilities. The Defense Reutilization Marketing Office is responsible for the disposal of hazardous waste materials.

### **4.9.7.2 Pathological Wastes**

The 1990 environmental assessment (U.S. Army Corps of Engineers, 1990) indicated that pathological waste is incinerated twice weekly. The 1967 Forest Glen Master Plan included a proposal to construct an onsite incinerator for disposing of pathological waste. Because of the concerns of the surrounding community, the incinerator was deleted in the 1976 Forest Glen Master Plan. Pathological waste is transported from the site by outside contractors and then autoclaved. Two contractors handle the waste: BFI, which handles sharps and regulated medical waste, and Calvin, which handles all other pathological waste.

### **4.9.7.3 Radiological Waste**

The low-level radiological waste generated by WRAMC (and its tenant activities) includes fluids, paper towels, plastic gloves, biological samples, and other materials that have come into contact with radioactive substances. Radiological waste that is generated at WRAMC facilities is temporarily stored in Building 516, located about one-half mile south of the NPSHD. An outside contractor transports the radiological waste from Building 516 to the Rock Island Army Base in Illinois for disposal.

#### 4.9.8 Contaminated Sites

Few specific sites of contamination have been identified at the Forest Glen Annex. Several spills of hazardous materials have required emergency response. These sites are described in the following discussion.

The Forest Glen Annex Fire Department responded to eight emergencies that occurred at the Historic District site between 1991 and 1999. The responses were for the following:

- Three incidents for fuel spills (gasoline and diesel): one at Building 178 and two at Building 120
- Two incidents of oil spills: one at Building 133 and one between Buildings 101 and 104
- One for a nitric acid spill at Building 178
- One for a spill of emulsifying agents at Building 121
- One for a spill of unknown hazardous substances at Building 101

The fire department performed containment, removal, and clean-up activities at the spill sites. A visual inspection during the EBS of the spill locations did not reveal stained soil or stressed vegetation. On the basis of a review of the response information and visual observation of the release areas, the determination was made that no additional sampling in the vicinity of the releases was required.

A survey was performed in 1998 in Building 120 to determine the presence of pigeon excrement (General Physics Corporation, 1998d). Pigeon excrement is likely to contain fungal-disease organisms. Excrement was detected in large quantities only in the attic. The survey concluded that the layer of dried excrement in the attic is a potential hazard to human health because the material may be inhaled in entrained dust. The survey recommended that the material be removed and birdproofing be installed.

Two potential contamination sites remain to be investigated. Stains were observed under the empty AST and on a dirt floor in the lower level of Building 120, in the 1998 site investigation of that building. Overfilling and sloppy filling likely caused the stain under the AST, while the cause of the stain on the dirt floor is unknown (General Physics Corporation, 1998e and f). WRAMC's Environmental Division plans to take samples to investigate the nature and extent of contamination, if any, represented by these stains in October 1999. The results and preliminary recommendations, if any, for additional investigation or remedial action at these potential sites will be made available before the Report of Excess is delivered to GSA (Moxley, personal communication, 10/12/99).

#### 4.9.9 Remedial Action Plan

A remedial action plan is being implemented at Building 500, outside of the NPSHD in the southern portion of Forest Glen Annex, to remediate contaminated groundwater. No other remedial actions are known to be required at the Forest Glen Annex at this time.

A Spill Control Plan is in place that covers the Main Post and the Forest Glen Annex. The plan addresses the required information such as security, training, emergency response teams. A list of potential spill sites, and appropriate actions to take if a spill of hazardous materials occurs. The plan is reviewed approximately once per year.

## Addendum to Section 4.9.8 Contaminated Sites

A site characterization action was conducted in Building 120 in November 1999. The purpose of this action was to assess the floor stains that were described in the *Modified Phase I Environmental Site Assessment, Building 120* (General Physics Corporation, 1998) and to make recommendations for any further actions that might be required to address contamination of surface soil.

The report, *Site Characterization and Cleaning at Building 120* (General Physics Corporation, 2000), was produced after the EA for National Park Seminary Historic District (NPSHD) was finalized and signed, but before it was advertised for public review. This Addendum to the EA for the NPSHD was prepared to incorporate that additional information into the public record and into the documentation that will accompany the proposed "Report of Excess Real Property" on the NPSHD.

Soil samples were collected by direct-push borings from 14 locations in four areas on the lower floor of Building 120: the former AST area, the east truck bay, and the northeast and northwest storage rooms (dirt floor areas). Twenty-one samples were analyzed in the field, of which only one (in the former AST area) exhibited total petroleum hydrocarbon (TPH) concentrations above the detection limits. Five soil samples were sent to an offsite laboratory to be analyzed for total volatile organic compounds and TPH.

All detected concentrations were below the action level of 100 milligrams per kilogram, which is used by Maryland Department of the Environment (MDE) for oversight of cleanup actions in respect to spills and storage tank removal. Although this action level of 100 milligrams per kilogram is not a regulatory level, consultation with MDE staff confirmed that it is considered acceptable for this purpose (Meade, personal communication, 2/23/2000).

The observed stains on concrete floor areas were removed by pressure washing and the liquids were contained and removed using a vacuum truck. Floor stains on dirt floor areas were removed by shoveling and placed in a 55-gallon drum. All of the wastes were sent to an approved offsite disposal facility.

According to the site characterization report, the field and laboratory activities were performed according to industry standards and the analytical results used to make decisions are acceptable for that purpose. All analytical results were below the unofficial but acceptable MDE level of 100 milligrams per kilogram; the observed floor stains and stained soil were removed; and no further action is required at the site.

### References:

General Physics Corporation. January 7, 2000. *Site Characterization and Cleaning at Building 120, Walter Reed Army Medical Center, Forest Glen Annex*. Prepared for US Army, Walter Reed Army Medical Center (LTC Moxley, Environmental Division).

Meade, Herb (Maryland Department of the Environment). February 23, 2000, personal communication with Bob Root (CH2M HILL).

## 4.10 Biological Resources

Descriptions of these resources are based on field investigations conducted in September and December 1997 and October 1989 and on known occurrences of species in similar habitat in the Rock Creek watershed. The site described in the following subsections consists of the 27-acre NPSHD property (Parcel 1) in the northern part of the Forest Glen Annex, the 4.7-acre Parcel 2 to the south of the NPSHD, and the 5.5-acre Parcel 3 to the east of the NPSHD (see Figure 3-1).

### 4.10.1 Vegetation

#### 4.10.1.1 Vegetative Communities

The undeveloped upland area, located mainly along the north and eastern boundaries of NPSHD and the railroad parcel to the east of the NPSHD, consists of contiguous forested ravines, dominated by a canopy of red oak (*Quercus rubra*), white oak (*Quercus alba*), and American beech (*Fagus grandifolia*). The subcanopy is dominated by red maple (*Acer rubrum*), flowering dogwood (*Cornus florida*), slippery elm (*Ulmus rubra*), and hickory (*Carya* spp.). The understory has been invaded by many exotic species, including English ivy (*Hedera helix*), Japanese honeysuckle (*Lonicera japonica*), Russian olive (*Elaeagnus angustifolia*), and privet (*Ligustrum* spp.). Groundcover is sparse and includes Christmas fern (*Polystichum acrostichoides*) along the shaded slopes. The forest is mature second growth, as evidenced by the large oaks and American beech measuring 36 to 42 inches in diameter at breast height (dbh) and 100 feet in height.

A narrow band of meadow habitat exists along the maintained (periodically mowed) sanitary sewer line, which runs along the stream corridor in the eastern portion of the NPSHD. The meadow includes goldenrod (*Solidago* spp.), common pokeweed (*Phytolacca americana*), blackberry (*Rubus* spp.), and various unidentified grasses.

The remainder of the NPSHD is developed and limited to landscape hedgerows, and mowed lawn grasses. The Linden Lane parcel located to the south of the NPSHD is forested in the southwest corner and is dominated by black oak, (*Quercus velutina*), white oak, hickory, and tulip tree (*Liriodendron tulipifera*). Tree cover boundaries are shown in Figure 4-8.

### 4.10.2 Wetlands

A delineation of jurisdictional wetlands and other waters of the U.S. was conducted in September 1997 for the entire (170-acre) Forest Glen Annex of WRAMC, as part of an *Integrated Natural Resources Management Plan* (Woolpert, 1999). Within the NPSHD, no jurisdictional wetlands were identified.

Other waters of the U.S. were identified onsite, including:

- A northern perennial stream that flows west, parallel to the Capital Beltway, from the NPSHD into Rock Creek (which parallels the northern boundary of Forest Glen Annex)
- Its tributary originating from a culvert beneath Hume Drive to the southeast



- A short watercourse originating from a culvert beneath Linden Lane in the northwest corner of the site
- The headwaters of an unnamed tributary to Rock Creek in the southwest corner of the Linden Lane parcel

Although the banks of the northern stream were mapped as hydric soils (Baile silt loam), no wetlands were identified there. Cement channeling has altered the natural hydrology of the stream. Waters of the U.S. are identified in Figure 4-8.

### 4.10.3 Wildlife and Fish

The wooded areas of NPSHD extend west into Forest Glen, which is contiguous to Rock Creek Regional Park. Rock Creek Regional Park extends north to Rockville and south to the larger Rock Creek Park (National Park Service [NPS]) in the District of Columbia. This connection provides a contiguous wildlife corridor between these areas. The corridor provides wildlife with safe travel, cover, easy access to drinking water, and protected sites for dens and nests. The following sections describe the wildlife and fish sighted or known to occur within the Rock Creek watershed.

#### 4.10.3.1 Amphibians and Reptiles

The stream onsite provides habitat for various amphibians and reptiles. The only species observed during the field investigations was the eastern box turtle (*Terrapen carolina*).

A study sponsored by the M-NCPPC identified 47 amphibians and reptiles in the Maryland portion of the Rock Creek watershed contiguous to the NPSHD. These species are listed in Table 4-7.)

#### 4.10.3.2 Birds

The forested slopes and streamside thickets within NPSHD provide valuable habitat for bird species adapted to suburban areas. During the field investigation of the site in December 1997, the following bird species were sighted: red-bellied woodpecker (*Melanerpes carolinus*), downy woodpecker (*Picoides pubescens*), Carolina wren (*Thryothorus ludovicianus*), white-breasted nuthatch (*Sitta carolinensis*), tufted titmouse (*Parus bicolor*), and northern cardinal (*Cardinalis cardinalis*).

The study sponsored by the M-NCPPC identified 144 species of birds that may be found within the Maryland portion of the Rock Creek watershed contiguous to NPSHD and the railroad and Linden Lane parcels.

Forested areas within NPSHD and the additional parcels contain interior dwelling bird habitat. This habitat is valuable to many populations of Forest Interior Dwelling (Bird) Species (FIDS), which are declining in Maryland and throughout the eastern United States (MDNR, 1997).



Figure 4-8  
 ENVIRONMENTAL CONSTRAINTS:  
 TREE COVER AND STREAM BUFFERS  
 NPSHD, Forest Glen Annex  
 Walter Reed Army Medical Center

SOURCE:  
 DRAFT INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN, WOOLPERT LLP,  
 1999; FOREST GLEN ADAPTIVE REUSE STUDY, MONTGOMERY COUNTY, 1995.

**TABLE 4-7**  
Amphibians and Reptiles in the Maryland Portion of the Rock Creek Watershed

Common Name	Scientific Name	Common Name	Scientific Name
Eastern newt	<i>Notophthalmus viridescens</i>	Worm snake	<i>Carphophis amonenu</i>
Spotted salamander	<i>Ambystoma maculatum</i>	Black racer	<i>Coluber constrictor</i>
Marbled salamander	<i>Ambystoma opacum</i>	Ringneck snake	<i>Diadophis punctatus</i>
Dusky salamander	<i>Desmognathus fuscus</i>	Corn snake	<i>Elaphe guttata</i>
Toe-lined salamander	<i>Erycea bislineata</i>	Black rat snake	<i>Elaphe obsoleta</i>
Long-tailed salamander	<i>Erycea longicauda</i>	Hognose snake	<i>Heterodon platyrhino</i>
Four-toed salamander	<i>Hemidactylium scutatum</i>	Mole snake	<i>Lampropeltis calligast</i>
Red-backed salamander	<i>Plethodon conerus</i>	King snake	<i>Lampropeltis getulus</i>
Slimy salamander	<i>Plethodon glutinosus</i>	Milk Snake	<i>Lampropeltis tranguil</i>
Mud salamander	<i>Pseudotriton montanus</i>	Water snake	<i>Natrix sipedon</i>
Red salamander	<i>Pseudotriton ruber</i>	Rough green snake	<i>Opheodrys aestivus</i>
American toad	<i>Bufo americanus</i>	Queen snake	<i>Regina septemvittata</i>
Fowler's toad	<i>Bufo fowleri</i>	Brown snake	<i>Storeria dekayi</i>
Northern cricket frog	<i>Acris crepitans</i>	Ribbon snake	<i>Thamnophis sauritus</i>
Spring peeper	<i>Hyla crucifer</i>	Garter snake	<i>Thamnophis sirtalis</i>
Gray treefrog	<i>Hyla versicolor</i>	Smooth earth snake	<i>Virginia valeriae</i>
Northern chorus frog	<i>Pseudacris triseriata</i>	Copperhead	<i>Agkistrodon contortri</i>
Bullfrog	<i>Rana catesbeiana</i>	Snapping turtle	<i>Chelydra serpentina</i>
Green frog	<i>Rana clamitans</i>	Painter turtle	<i>Chrysemys picta</i>
Pickerel frog	<i>Rana palustris</i>	Spotted turtle	<i>Clemmys guttata</i>
Wood frog	<i>Rana sylvatica</i>	Box turtle	<i>Terrapene carolina</i>
Leopard frog	<i>Rana pipiens</i>	Eastern mud turtle	<i>Kinosternon subrubru</i>
Eastern fence lizard	<i>Sceloporus undulatus</i>	Stinkpot	<i>Sternotherus odoratu</i>
Five-lined skink	<i>Eumeces fasciatus</i>		

#### 4.10.3.3 Aquatic Resources

As discussed in Section 4.5, two unnamed streams convey stormwater from the NPSHD and Parcels 2 and 3 to Rock Creek, which parallels the western boundary of Forest Glen (see Figure 4-8). These streams are designated Class I streams by MDNR: free-flowing, non-trout streams, suitable for recreational use. The northernmost stream, in the Lower Glen, drains the NPSHD. This stream appears to be a perennial stream, on the basis of field observations of flow observed in the stream, the amount of flow from culverts, floodplain vegetation, and the width of the stream channels (RGH, May 1990). This stream receives water from numerous stormwater pipes and from a tributary originating at a large culvert beneath I-495.

As discussed in subsection 4.10.1.1 “Vegetative Communities,” the stream in the NPSHD is buffered by a contiguous mature forest. The existing buffer exceeds the buffer width recommended by the Montgomery County Planning Board (MCPB). MCPB recommends a stream buffer of 100 feet around each stream to prevent erosion and protect water quality. Streams adjacent to slopes having a grade of 25 percent or more are recommended to have buffers of 150 feet (M-NCPPC, 1997).

The headwaters of a second stream and its associated buffer are located within Linden Lane Parcel 2. A contiguous mature forest buffers the stream to its confluence with Rock Creek. The buffer also exceeds the buffer width recommended by MCPB. Stream buffer boundaries based on MCPB’s recommended widths are mapped in Figure 4-8. Slope gradients are mapped in Figure 4-9.

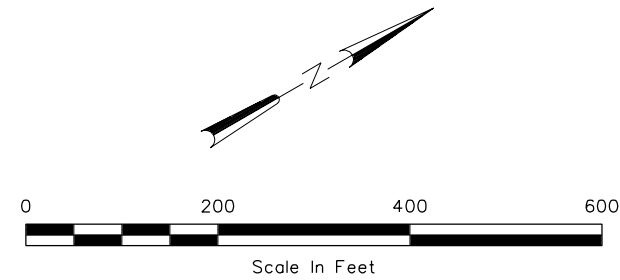
Aquatic fauna that might inhabit these streams would be similar to fauna found in other tributaries of Rock Creek. Table 4-8 lists fish species observed in Rock Creek that may be found in these tributaries. The types of aquatic fauna found in Rock Creek and its tributaries are influenced by the large amounts of sediment and pollution received from stormwater runoff. Macroinvertebrates sampled in the tributaries within the District of Columbia were mainly pollutant tolerant species found in degraded streams (Edmundson, 1988).

#### 4.10.3.4 Mammals

Specific occurrences of mammals were recorded during field investigations conducted in September and December 1997. Occurrences included visual sightings of animals or signs of their presence in the area (e.g., scat, tracks, burrows, calls, and skeletal remains).

The forested areas and meadows within NPSHD and the additional parcels provide habitat for many mammals. Sightings included the eastern gray squirrel (*Sciurus carolinensis*), eastern chipmunk (*Tamias striatus*), eastern cottontail rabbit (*Sylvilagus floridanus*), raccoon (*Procyon lotor*), woodchuck (*Marmota monax*), red fox (*Vulpes fulva*), and white-tailed deer (*Odocoileus virginianus*).

The M-NCPPC study identified 30 species of mammals in the Maryland portion of the Rock Creek watershed (Shosteck, 1977). These species are listed in Table 4-9.



- LEGEND**
- HISTORIC DISTRICT BOUNDARY
  - ADDITIONAL PARCELS BEING CONSIDERED FOR EXCESSING
  - SLOPES - 15% TO 25%
  - SLOPES - MORE THAN 25%

Figure 4-9  
 ENVIRONMENTAL CONSTRAINTS:  
 STEEP SLOPES  
 NPSHD, Forest Glen Annex  
 Walter Reed Army Medical Center

SOURCE:  
 DRAFT INTEGRATED NATURAL RESOURCES MANAGEMENT PLAN, WOOLPERT LLP,  
 1999; FOREST GLEN ADAPTIVE REUSE STUDY, MONTGOMERY COUNTY, 1995.

**TABLE 4-8**  
Fish Species Observed in Rock Creek

Common Name	Scientific Name	Common Name	Scientific Name
American eel	<i>Aguilla rostrata</i>	Swallowtail shiner	<i>Notropis pocne</i>
Brown trout	<i>Salmo trutta</i>	Satinfin shiner	<i>Notropis analostanus</i>
Blacknose dace	<i>Rhinichthys atratulus</i>	White sucker	<i>Catostomus commersoni</i>
Longnose dace	<i>Rhinichthys cataractae</i>	Hogsucker	<i>Hypentilium nigricans</i>
Rosyside dace	<i>Cloinostomus funduloides</i>	Yellow bullhead	<i>Ictalurus natalis</i>
Rosyface dace	<i>Notropis rubellus</i>	Channel catfish	<i>Ictalurus punctatus</i>
Cutlips minnow	<i>Exoglossum maxillingua</i>	Margined madtom	<i>Noturus insignis</i>
Fallfish	<i>Semotilus corporalis</i>	Largemouth bass	<i>Micropterus slamoides</i>
Creek chub	<i>Semotilus atromaculatus</i>	Pumpkinseed sunfish	<i>Lepomis gibbosus</i>
Golden shiner	<i>Notemigonus crysoleucas</i>	Bluegill sunfish	<i>Lepomis macrochirus</i>
Carp	<i>Cyprinus carpio</i>	Green sunfish	<i>Lepomis cyanellus</i>
Spottail shiner	<i>Notropis hudsonius</i>	Redbreast sunfish	<i>Lepomis auritus</i>
Spotfin shiner	<i>Notropis spilopterus</i>	Tessellated darter	<i>Ethostoma olstedii</i>
Silverjaw minnow	<i>Ericmba buccata</i>	Shield darter	<i>Percina peltata</i>
Common shiner	<i>Notropis cornutus</i>	Mottled sculpin	<i>Cottus bairdi</i>

**TABLE 4-9**  
Mammals in the Maryland Portion of Rock Creek Watershed

Common Name	Scientific Name	Common Name	Scientific Name
Opossum	<i>Didelphis marsupialis virginiana</i>	Muskrat	<i>Ondatra zibethicus macrodon</i>
Pigmy shrew	<i>Microsorex hoyi winnemana</i>	Roof rat	<i>Rattus rattus alexandrinus</i>
Short-tailed shrew	<i>Blarina brevicauda kirtlandi</i>	Norway rat	<i>Rattus norvegicus</i>
Least shrew	<i>Cryptotis parva</i>	Black rat	<i>Rattus rattus</i>
Eastern mole	<i>Salopus a. aquaticus</i>	House mouse	<i>Mus musculus</i>
Star-nosed mole	<i>Condylura c. cristata</i>	Meadow jumping mouse	<i>Zapus hudsonius americanus</i>
Eastern cottontail	<i>Sylvilagus floridanus mallurus</i>	Red fox	<i>Vulpes vulpes fulva</i>
Eastern chipmunk	<i>Tamias striatus</i>	Gray fox	<i>Urocyon c. cinereoargenteus</i>
Woodchuck	<i>Marmota m. monaz</i>	Raccoon	<i>Procyon l. lotor</i>
Red squirrel	<i>Tamiasciurus hunsonicius loquax</i>	Long-tailed weasel	<i>Mustela frenata noveboracensis</i>
Eastern gray squirrel	<i>Sciurus carolinensis pennsylvanicus</i>	Striped skunk	<i>Mephitis mephitis nbigra</i>
Flying squirrel	<i>Glaucomys v. volans</i>	White-tailed deer	<i>Odocoileus virginianus borealis</i>
White-footed deer mouse	<i>Peromyscus leucopus noveboracensis</i>	Silver haired bat	<i>Lasionycteris noctivaans</i>
Beaver	<i>Castor canadensis</i>	Big brown bat	<i>Eptescius f. fuscus</i>
Eastern wood rat	<i>Neotoma floridana magister</i>	Hoary bat	<i>Lasiurus c. cinereus</i>
Meadow vole	<i>Microtus p. pennsylvanicus</i>	Evening bat	<i>Nyctceius h. humeralis</i>
Pine vole	<i>Pitymus pinetorum scalopsoides</i>	Eastern pipistrelle	<i>Pipistrellus s. subflavus</i>

#### 4.10.4 Rare, Threatened, and Endangered Species

The MDNR, Wildlife and Heritage Division has no records for federal or state rare, threatened or endangered plants or animals within NPSHD (MDNR, 1997). The USFWS also has no records and has not designated any areas on the site as Critical Habitat.

Table 4-10 lists threatened and endangered species occurring within Montgomery County and Rock Creek Park. Most of these species require extensive pristine and unpolluted habitat that does not exist in the NPSHD or in Parcels 2 and 3.

TABLE 4-10

Threatened and Endangered Species Occurring within Montgomery County and Rock Creek Park

	Common Name	Scientific Name	Habitat
<b>Invertebrates</b>	Six-banded longhorn beetle	<i>Dryobius sexnotatus</i>	Rich forests
	Hay's spring amphipod	<i>Stygobromus hayi</i>	Springs
<b>Birds</b>	Sedge wren	<i>Cistothorus platensis</i>	Marshes
	Bald eagle	<i>Haliaeetus leucocephalus</i>	Near rivers, bays
<b>Mammals</b>	Least weasel	<i>Mustela nivalis</i>	woodlands
<b>Plants</b>	Deciduous holly	<i>Ilex decidua</i>	Swamps and low grounds
	Virginia false-gromwell	<i>Onosmodium virginianum</i>	Dry rocky areas
	Yellow nailwort	<i>Paronychia virginica</i>	Dry sandy areas e.g. Great Falls
	Blue scorpion - weed	<i>Phacelia ranunculacea</i>	Along Potomac River
	Purple fringeless orchid	<i>Platanthera flava</i>	Moist meadows
	Grass-like beakrush	<i>Rhynchospora globularis</i>	Marshes, wet meadows
	Virginia mallow	<i>Sida hermaphrodita</i>	Big stream's floodplains
	Featherbells	<i>Stenanthium gramineum</i>	Open wet meadows

A stream survey of the federally endangered Hay's Spring amphipod (*Stygobromus hayi*) was conducted in NPSHD in October 1989 and April 1990. The survey was conducted because a preliminary report based on available literature and interviews with the Maryland Natural Heritage Program concluded that the Hay's Spring amphipod might exist on the site if springs and/or groundwater seeps were present in Forest Glen (RGH, 1990b). Results of the stream survey found no evidence of the Hay's Spring amphipod (RGH, 1990).

In 1997, as part of the *Integrated Natural Resources Master Plan* for WRAMC, surveys for rare, threatened, and endangered species were conducted at Forest Glen. No federal or state-listed species were observed at NPSHD during the three-season survey period (Woolpert, 1999).

## 4.11 Cultural Resources

The following subsections provide an overview of the prehistory of the region, the history of the Forest Glen Annex area, a review of previous cultural resource research, and a description of cultural resource documentation for the affected parcels.

### 4.11.1 Prehistoric Context

WRAMC's Forest Glen Annex is located in Montgomery County, Maryland, which is in the Maryland Piedmont. The prehistoric archaeological record of the Maryland Piedmont is divided into five time blocks: the Paleo-Indian/Early Archaic Period (12,000 B.C. - 6500 B.C.), the Middle Archaic Period (6500 B.C. - 3000 B.C.), the Late Archaic/Early-Middle Woodland Period (3000 B.C. - A.D. 1000), the Late Woodland Period (A.D. 1000 - A.D. 1650), and the Contact period, which extends from A.D. 1650 to 1750—the approximate date of the final Native American habitation of Maryland.

During the Paleo-Indian/Early Archaic Period, native peoples in eastern North America were adapting to the change from Pleistocene to Holocene environments. The Forest Glen area could have been occupied by native peoples who subsisted by hunting and gathering, with hunting providing a large portion of the diet. During the Middle Archaic Period, a reduction in open grasslands caused the extinction of many grazing animals hunted during the previous period. The hunting focus of the earlier prehistoric groups changed to a more generalized foraging pattern, in which plant food resources played a more important role. Large base camps and a number of small procurement sites at favorable hunting/gathering locales are known.

In the Late Archaic/Early-Middle Woodland Period, major changes throughout the Middle Atlantic region in the environment and distribution of resources caused a radical shift in adaptations for prehistoric groups. Important areas for settlements included major river flood plains and swamp/marsh areas. Large base camps supported larger populations than previous base camp sites and may have been occupied on nearly a year-round basis.

The Late Woodland Period is marked, in some areas of Maryland, by the appearance of agricultural food production systems and evidence of true village life by A.D. 1350. Villages were occupied by sedentary agricultural societies employing technologies little changed from the earlier Middle Woodland period, except for the introduction of the bow and arrow sometime after A.D. 1000.

The Contact Period is associated with major changes in Native American lifeways in Maryland. The development of the fur trade during the seventeenth century disrupted traditional Native American technological and social systems and colonization dispossessed local Native American populations of their lands. By the mid-eighteenth century, few Native Americans remained in Maryland.

### 4.11.2 Historic Context

WRAMC's Forest Glen Annex, located in Montgomery County, Maryland, occupies a portion of "Joseph's Park," a 4,500-acre tract granted to William Joseph by Lord Baltimore in the 1680s. Joseph's grandson, William Carroll, developed the northern portion of the tract as



“The Highlands,” whose main house was located west of the property presently occupied by Forest Glen Annex. The southern portion of the estate passed into the sole possession of Robert Brent, who developed the property as “Edgewood.” By 1816 Robert Brent had obtained ownership of both parcels, and the entire property remained in the Brent family until the 1850s (Geiger 1979; Gordon 1988).

The portion of Forest Glen Annex located south of Linden Lane originally constituted part of “Edgewood,” while the area north of Linden Lane belonged to “The Highlands.” The northern portion of the installation appears to have remained undeveloped until the last quarter of the nineteenth century, principally because the area’s steep slopes precluded any viable agricultural activity. An 1863 map of “The Highlands” depicts this area as entirely wooded. The southern portion of the installation, “Edgewood,” offered better opportunities for agricultural development. Brent constructed a two-story frame house, as well as various outbuildings, on the property circa 1800, and developed the tract as a tobacco plantation. The main house survived until the early 1960s when it was demolished to make way for the present Community Center complex.

In 1855, The Highlands and Edgewood fell into separate hands. Charles M. Keys (1829-1873), who purchased Edgewood in 1862, operated a coal, wood, and feed business in Washington, D.C. The property remained in the Keys family until circa 1928, when the heirs sold the entire tract to Dr. James Ament, president of the adjacent National Park Seminary (see subsections 4.11.2.1 and 4.11.2.2).

In 1863, Alfred Ray, Charles Keys’ brother-in-law and a Southern sympathizer who apparently feared for his safety in Washington, purchased the Highlands as a refuge. In 1863, Confederate General Jubal Early’s troops stopped at the Highlands. In 1864, Ray was arrested, tried, and convicted by the federal government, and served 2 months in a federal prison. Upon his release, Ray returned to the Highlands, where he lived until his death in January 1895.

Ray lived at The Highlands’ main house, located west of Forest Glen Annex. His agricultural operations were recognized for his innovative use of irrigation and fertilizer. However, the portion of The Highlands presently included within Forest Glen Annex, steeply sloped and poorly soiled, apparently remained undeveloped until the late 1880s, when Ray sold that portion of the property to the Forest Glen Improvement Company.

#### **4.11.2.1 Land Development Company**

Upon completion of the Metropolitan Branch of the Baltimore & Ohio Railroad, which ran along the eastern and northern boundaries of the tract, Alfred Ray sold out to the Forest Glen Improvement Company (FGIC). The railroad line, which established a Forest Glen Station at the northern edge of the Improvement Company’s property, as well as a newly completed trolley line, improved transportation between the Forest Glen area and Washington and provided the impetus for development of the area. The FGIC sought to capitalize on this by subdividing its property for development as suburban residential lots.

The FGIC laid out streets and building lots on its property and erected a hotel, “Ye Forest Inn,” in which potential customers could stay while visiting the area and selecting their lot. The inn, designed by Washington architect T. F. Schneider, opened circa 1888. Residential

development occurred slowly, with the first houses completed in 1889. In an effort to encourage investment and development, the FGIC introduced gambling at the inn, but the economic hard times of the early 1890s compelled the directors of the FGIC to seek alternative uses for the property.

In 1894, the FGIC sold approximately 40 acres of land located at the eastern edge of their property to Dr. John Cassedy and his wife Vesta.

#### 4.11.2.2 National Park Seminary

In September 1894, Dr. Cassedy, an educator and former owner of Norfolk Junior College, opened the National Park Seminary in the former Forest Inn. National Park Seminary was an all-girls private school, advertised as a “A Junior College and Preparatory School for Young Women.”

The Cassedys undertook a substantial building program after they acquired ownership of the property. This program included the construction of eight sorority clubhouses, each in a different architectural style, two dormitories, a small theater, a gymnasium, a chapel, and a variety of other buildings that established the eclectic architectural character of the campus, which presently includes a: Japanese pagoda, Dutch windmill, Swiss chalet, castle, Italian villa, and a collection of Spanish Colonial Revival maintenance and staff buildings. The Cassedys also oversaw a program of extensive landscape improvements, including arched pedestrian bridges, covered connecting corridors, stone-lined walkways and paths, formal and informal gardens, and statuary.

In 1916, following the death of Vesta Cassedy, National Park Seminary was sold to Dr. James Ament. During Ament’s tenure, most of the school’s buildings were enlarged and altered. Virtually every sorority clubhouse was enlarged, buildings originally clad with wood shingles were stuccoed, several large additions to the main building were constructed, including a spectacular ballroom, and additional landscape elements introduced. In 1928, Ament purchased the 150-acre Edgewood property, which abutted the school property to the south, from Charles Keys’ heirs. Ament maintained Edgewood, which he renamed Amentdale, as a working farm, with some of the produce sold for profit and some directed to the school’s kitchens. The school’s students had access to the farm for picnics, horseback rides, and other forms of outdoor recreation. In the late 1930s, Roy Tasco Davis, Ament’s son-in-law, acquired the property and incorporated the school as National Park College. The school continued to operate until 1942.

#### 4.11.2.3 Military History

In 1942, the United States Army acquired the entire parcel for use as a convalescent center. The first patients arrived at WRAMC’s Forest Glen Annex in January 1943. The installation provided clinics and wards for patients along with separate messing and billeting for personnel and a maximum of 500 patients. According to a newspaper article at the time:

“...[a] one-time finishing school for ritzy sweet young things becomes the healer of the sick and maimed, giving the boys in khaki a luxurious but none the less homelike atmosphere to smooth the comeback trail. There's no suggestion of the hospital about it-and for that the men are grateful.”

(*The Sun* [Baltimore], May 30, 1947, as quoted in the NRHP nomination form for the NPSHD prepared in 1972).

After 1946, as the need for convalescent beds diminished, space became available at Forest Glen Annex for other activities. In 1947, both the Army Prosthetics Research Laboratory and Audiology and Speech Correction Center were established in former school buildings. In 1953-1954, a series of new laboratories and animal houses were built at the south end of the property, permitting expansion of WRAIR's activities at the installation. In 1971, the large Community Center complex, located on the former site of the Edgewood plantation house south of the current NPSHD, opened. Convalescent wards in the former school buildings were closed in 1972, as the conflict in Vietnam was ending, and many of these buildings were either wholly or largely vacated at that time. In September 1972, the NPSHD was listed on the NRHP in recognition of the school's historical and architectural significance.

Currently, the majority of buildings located on the former National Park Seminary campus are vacant or have restricted access. A few buildings still are in use, such as the fire station in Building 121, the Power Plant in Building 120, and the homeless shelter in Building 125. The southern portion of the Forest Glen Annex (located outside the historic district boundaries) includes the Community Center complex and a series of buildings used for service and supply, maintenance, and research and development activities.

#### 4.11.2.4 Offsite Historic Resources

In the vicinity of Forest Glen Annex, there are a number of other locally recognized historic resources, besides the National Park Seminary. These include the Linden Historic District, the Forest Glen Historic District, the (potential) Woodside Historic District, the Ira Jones House, the Smith-Hobbs House, the Louis and Anne Smith House, Meadowbrook Stables, the Lawrence House, which are listed on the Montgomery County Locational Atlas, and the Montgomery Hills Shopping Center, which is recommended for removal from the Atlas (M-NCPPC, 1998e).

### 4.11.3 Summary of Cultural Resource Investigations

Forest Glen Annex, WRAMC, and specifically the National Park Seminary, have been subject to numerous cultural resource investigations. The 1972 NRHP Nomination for NPSHD determined specific boundaries for the district and inventoried contributing and non-contributing resources within those boundaries. Three subsequent studies investigated additional cultural resources at Forest Glen Annex.

John Milner & Associates conducted a reconnaissance survey of the facility in 1990. Two 1992 studies, "Forest Glen Annex WRAMC Cultural Resources Management Plan" (CRMP) and "Forest Glen Annex WRAMC Follow-on Architectural Survey," conducted by Kise Franks and Straw (KFS) addressed both known and unidentified cultural resources at Forest Glen. The Architectural Survey identified three buildings (Buildings 135, 136, and 139) with historical connections to National Park Seminary, but located outside the historic district and recommended that the historic district boundaries be extended to include these buildings.

In 1998, R. Christopher Goodwin & Associates prepared the draft *Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Grandine et al., 1998), which

summarized the findings of all previous cultural resources investigations and provided guidance on the maintenance and management of cultural resources at WRAMC's Main Section and Forest Glen Annex, particularly the NPSHD. This latest report did not involve any new building investigations at the NPSHD, but used information collected by Higginbotham/Briggs & Associates for the 1997 facility use studies as a primary source, in addition to previous studies. Appendix E presents a summary of building-by-building descriptions and condition assessments drawn from these documents.

The majority of other studies associated with National Park Seminary Historic District have focused on condition assessments, stabilization recommendations, and reuse strategies for the buildings located in the historic district. Relevant reports addressing these issues are listed below.

- *Feasibility Study National Park Seminary, Site Preservation, Forest Glen, Maryland* (Keyes, Lethbridge, and Condon, 1973)
- *Forest Glen Adaptive Reuse Study* (EDAW et al., 1995)
- *Facility Condition Assessment for the Historic District of the Forest Glen Annex, Walter Reed Army Medical Center* (Higginbotham/Briggs & Associates, et al., 1996)
- *Environmental Baseline Study for the Historic District of the Forest Glen Annex of Walter Reed Army Medical Center* (CH2M HILL, 1996)
- *Site Condition Assessment for the Historic District of the Forest Glen Annex* (Higginbotham/Briggs & Associates, et al., 1997a)
- *Preliminary Facility Use Study, Historic District of the Forest Glen Annex–Walter Reed Army Medical Center* (Higginbotham/Briggs & Associates, et al., 1997b)
- *Comprehensive Plan for Basic Repair and Stabilization for the Historic District of the Forest Glen Annex* (Higginbotham/Briggs & Associates, et al., 1997c)
- *Economic Feasibility Study for Facility Reuse, Historic District of the Forest Glen Annex – Walter Reed Army Medical Center* (Higginbotham/Briggs & Associates, et al., 1997d)
- *Draft Walter Reed Army Medical Center Integrated Cultural Resources Management Plan* (Grandine et al., 1998)

## 4.11.4 Cultural Resources Assessment

### 4.11.4.1 Archeological Resources

Examination of the “quad files” maintained at the Maryland Geological Survey division of Archaeology, as well as of previously completed cultural resources reports for WRAMC Forest Glen Annex, indicates that no known prehistoric or historic archeological sites are recorded within Forest Glen Annex and specifically NPSHD. Correspondence from the Maryland Historical Trust and a review of previously completed cultural resources studies indicate that there is a low probability for prehistoric or historic archeological sites at Forest Glen Annex. The Maryland Historical Trust, which serves as the State Historic Preservation Officer (SHPO) for Maryland, has stated that “the topography of the facility and the

disturbance from prior construction lead to the conclusion that there is a low potential of finding NRHP eligible sites at Forest Glen.” A November 1991 letter from the SHPO concluded that “further archeological investigations are not warranted for the Forest Glen property.” That conclusion has been reaffirmed in recent correspondence concerning the 1998 Draft CRMP.

#### 4.11.4.2 Architectural Resources

During preparation of the 1992 CRMP, previous cultural resource reports and surveys, as well as real property records, were reviewed to identify buildings and structures at Forest Glen Annex constructed before 1950 and thereby potentially eligible for listing in the NRHP by virtue of being more than 50 years of age. During this work, it became apparent that most of the historic resources constructed before 1950 had been either previously evaluated for their NRHP eligibility or were, in fact, already listed in the NRHP as part of the NPSHD (listed in 1972).

Consultations with the Maryland Historical Trust and the M-NCPPC were initiated to obtain current information regarding the boundaries and period of significance of the historic district to ascertain which buildings contributed to the character of the historic district. The district boundaries were not clearly delineated on the original NRHP Nomination Form; however, discussions with both the keeper of the NRHP and the Maryland Historical Trust in 1992 indicated that consistent boundaries have been acknowledged by state and federal historic preservation agencies for several years. These boundaries consist of the installation boundary (the Capital Beltway, I-495) on the north, Smith Drive on the east, and Linden Lane on the south and west.

The present appearance of the former campus most closely reflects the period of Ament’s ownership and presidency (1916 to 1930s). The NRHP Nomination Form clearly indicates that the significance of the district is limited to its associations with National Park Seminary. The district’s period of significance is stated as extending from 1894 to circa 1930, excluding the Army’s period of ownership, which began in 1942. A review of the NRHP nomination indicates that all buildings and structures associated with National Park Seminary may be considered contributing resources, while those resources not associated with the school must be considered non-contributing.

There are 29 buildings located within the NPSHD, of which 24 date from the period of National Park Seminary. All 24 of these buildings contribute to the character of the historic district. Several of these buildings may be individually eligible for the NRHP based upon their historical and architectural significance. However, the fact that these properties constitute an ensemble, within the context of their association with National Park Seminary, provides them with a collective significance greater than their individual historical or architectural importance. Individual buildings within the NPSHD have experienced alterations that compromise their integrity, most notably Buildings 112, 125, and 101c (Science Wing). However, these resources still contribute to the historic district.

The Odeon—once a part of Building 104—no longer exists, having been destroyed by fire in 1993.

The remaining buildings within the NPSHD (Buildings 160, 185, 186, 187, and 188), were constructed by the Army during the period from 1942 to 1945 and are considered non-contributing resources because they do not contribute to the character of the historic district as described on the NRHP Nomination Form (KFS, 1992). In terms of military history, these utilitarian laboratory buildings served as secondary support facilities to the major research facilities at Main Section. The 1998 draft CRMP recommends that they do not possess those qualities of exceptional significance needed to make them eligible for the NRHP (Grandine, et al., 1998).

A 19<sup>th</sup>-century log cabin (Building 148) that was associated with the Edgewood estate was formerly located near the Post Exchange service station, to the south of the NPSHD. This building was determined not to be eligible for the NRHP and it was disassembled and removed from the property in 1993.

An additional 10 architectural resources are located within Forest Glen Annex, but outside the commonly acknowledged boundaries of the NPSHD. Seven of these buildings (Buildings 148, 152, 154, 155, 156, 189, and the ruins of a stone picnic shelter located west of Stephen Sitter Avenue on the north side of an unnamed tributary of Rock Creek) had been previously determined not eligible for listing in the NRHP and are not part of the proposed action or alternatives.

Three other historic buildings (Buildings 135, 136, and 139) are located just outside the boundaries of NPSHD on the additional parcels that are being considered for excessing along with the NPSHD (see Figure 3-1). They were built sometime between 1902 and 1907 and were used as quarters for National Park Seminary staff during the district's period of significance. A 1992 cultural resources study recommended that all three of these buildings were potentially eligible for the NRHP because of their direct associations with the National Park Seminary during the district's period of significance. The 1992 study also recommended that the existing district boundaries be modified to include these buildings. No formal determination has been made regarding these buildings or the district boundary, but the 1998 draft ICRMP refers to them as contributing to a (proposed) Expanded Historic District (Grandine, et al., 1998).

Building 135 (the Chauffeur's Quarters) and Building 139 (Poultryman's Cottage) are located in Parcel 2.. Building 135 and Building 139 are similar in architectural design and ornamentation. Both buildings are square, wood-frame structures with one-story wrap-around porches. Building 139 was condemned after being structurally damaged by a falling tree in 1992 (Porter, personal communication, 5/21/99). Building 136 (Carpenter's Cottage) is located on Parcel 3. Building 136 is a simple, L-shaped, wood-frame structure terminating in a front gable.

#### 4.11.4.3 Landscape/Setting

Most of the landscape elements located within the NPSHP, including retaining walls, paths, bridges, statues, and other decorative features, are associated with the National Park Seminary and constitute contributing elements within the historic district.

The landscaped grounds associated with National Park Seminary represent an important element in the site's history. They incorporate both natural features (the wooded Glen) and

designed features (Justice Garden). Threaded through the eclectic grouping of buildings contained within NPSHD are paths, bridges, steps, walls, gardens, and statues as well as trees, shrubs, lawns, and a creek. The majority of these features contribute to the significance of the historic district. Most of the landscape elements currently are overgrown.

Roadways and bridges that were part of the original landscape plan, which was oriented towards the former railroad station to the north, were demolished along with the railroad station when the Capital Beltway (I-495) was built in the 1960s.

## 4.12 Visual and Aesthetic Values

National Park Seminary comprises the northernmost 27-acre portion of the approximately 183-acre Forest Glen Annex. WRAMC's Forest Glen Annex is located within a larger area of residential and institutional use with smaller pockets of industrial and commercial uses. Views from the historic district also include the Capital Beltway to the north, a residential neighborhood to the west, a service area of Forest Glen Annex to the east, and the rest of WRAMC's Forest Glen Annex to the south. This area contains a number of large buildings, parking areas, and sloping land. Rock Creek Park provides a major visual element in the area, with a portion of the park bordering Forest Glen Annex on the southwest.

The Main (Ye Forest Inne, Building 101A) forms the core of the historic district. The building with its dormers and towers and wrap-around porches is oriented north, facing the former railroad station (and now the Capital Beltway). A circular driveway leading to the main entrance and a large marble fountain define the main entrance. The Glen, directly north of Building 101A, forms the major non-structural visual element within NPSHD. The Capital Beltway is (seasonally) visible from within the NPSHD, as are local residential neighborhoods and existing commercial/industrial land uses inside and outside the boundaries of the Forest Glen Annex.

Because the historic district is oriented north with its "back" to Linden Lane, the view of the NPSHD from offsite is a mixture of the pleasing and utilitarian. Major visual elements of the NPSHD as viewed from offsite are the four houses south of Linden Lane; the Japanese Pagoda; the Swiss Chalet; the Chapel with its stained glass windows; the visibly deteriorated Gymnasium; the undistinguished bulk of the Ballroom (which is valued aesthetically for its interior), and the unattractive, concrete block laboratory buildings built in the 1950s. Views of Building 101 from offsite do not include many of the more visually intriguing features of that connected series of buildings. The aesthetic value of the NPSHD to the surrounding community, which has inspired many amateur works of art, requires access to the interior of the site to be fully appreciated.

## 4.13 Social and Economic Environment

The NPSHD is located in Montgomery County's Planning Area #36 (Silver Spring), which makes up about 4.4 square miles in land area. The direct and indirect social effects of the proposed action are more likely to be felt in Silver Spring and the neighborhoods closest to Forest Glen Annex, rather than throughout Montgomery County as a whole, so the following

subsections present background information about Planning Area #36 and about smaller areas (Census tracts) adjacent to the Forest Glen Annex.

The region of influence (ROI) for the potential economic effects of the proposed action is best defined as Montgomery County, Maryland. Montgomery County, the largest (492 square miles) and most affluent county in the state, is one of the inner suburban jurisdictions of the Washington, DC-MD-VA-WV Primary Metropolitan Statistical Area (PMSA). The DC-MD-VA-WV PMSA includes 18 counties, the District of Columbia, and 6 small cities. The county is also part of the Washington-Baltimore DC-MD-VA-WV Consolidated Metropolitan Statistical Area (CMSA), which is comprised of the Washington PMSA, plus the City of Baltimore and seven additional counties. Although regional economic activities are interrelated throughout both the PMSA and CMSA, it is unlikely that any economic effects of the proposed action would be noticeable in these larger areas.

### 4.13.1 Demographics

#### 4.13.1.1 Population

Montgomery County had a estimated population of over 805,930 in 1995. About 4 percent of the county's population lives in the Silver Spring Planning Area.

The area immediately surrounding the Forest Glen Annex is Census tract 7027, which had a population of 8,851 persons in 1990. Census tract 7027 is a 1.4-square mile area that includes the adjacent Forest Glen Park neighborhood and is bounded by the CSX rail line to the east and Rock Creek to the south and west (see Figure 1-1). The two adjacent Census tracts, bounded by Georgia Avenue to the east and Connecticut Avenue to the west of the Forest Glen Annex, had a combined population of 6,068 persons in 1990. The Capital Beltway is the northern boundary of all three tracts.

Table 4-11 presents some demographic characteristics of Montgomery County and the areas surrounding Forest Glen Annex.

The area surrounding the NPSHD is urbanized and densely populated. The average population density of the surrounding Census tracts is over 4,000 persons per square mile, which is nearly three times greater than that of Montgomery County as a whole, and the population density of the Silver Spring Planning Area is over 7,5000 persons per square mile, nearly five times that of the county as a whole.

The average age of county residents increased from 34 years to 36 years between 1990 and 1994, due mostly to the aging of the "baby boom" generation. Residents of the Silver Spring area on average are slightly older and have fewer school-aged children than in the countywide population. There are considerably more people over 65 years of age, and correspondingly fewer school children, living in the Census tracts adjacent to the Forest Glen Annex than in the surrounding area. There are proportionately fewer family households and more one-person households in the Silver Spring area than in Montgomery County as a whole.



**TABLE 4-11**  
Demographic Characteristics

	<b>Census Tract 7027 <sup>1</sup></b>	<b>Adjacent Census Tracts <sup>2</sup></b>	<b>Planning Area # 36 <sup>3</sup></b>	<b>Montgomery County <sup>4</sup></b>
Total Population	6,164	8,851	N/A	816,999
Land Area	1.4 sq. mi.	1.9 sq. mi.	4.4 sq. mi.	494.6 sq. mi.
Population Density (persons/sq. mi.)	4,403	4,658	7,533	1,652
Household Population <sup>5</sup>	6,068	8,649	33,145	795,600
Average Age	N/A	N/A	38 years	36 years
School-Aged (5-17 years old)	16%	11%	14%	18%
65 Years and over	12%	20%	15%	12%
% High School or some college	N/A	N/A	31%	37%
% College degree and beyond	41%	59%	58%	56%
Total Households	2,227	3,927	15,625	299,300
Average Household Size	2.8	2.3	2.1	2.7
% Family Households	61%	57%	55%	75%
% One-Person Households	25%	35%	41%	22%
Average Age of Household Head	N/A	N/A	49 years	49 years

1. Tract 7027 includes the Forest Glen Annex, Forest Glen Park, and an area to the south. Source: U.S. Census Bureau, 1990. Population density and percents for Census Tracts are based on total population as of the 1990 Census.

2. Tracts 7028 (east of the Forest Glen Annex) and 7051 (west of the Forest Glen Annex). Source: U.S. Census Bureau, 1990.

3. Silver Spring Planning Area Profile. Source: Montgomery County Planning Board (M-NCPPC), December 1995, 1994 Census Update Survey. Population density and percents for Planning Area # 36 are based on household population estimates for 1994.

4. Source: Montgomery County Planning Board (M-NCPPC), December 1995, 1994 Census Update Survey; *except* Total Population = estimate as of July 1, 1996, by Maryland Office of Planning, December 1997. Population density for Montgomery County is based on 1995 estimated population. Percents for Montgomery County are based on household population estimates for 1994.

5. Estimated number of persons living in households (excludes persons living in group quarters such as jails, college dormitories, nursing homes, etc).

Residents of both Montgomery County and Silver Spring are very well-educated, with 56 percent and 58 percent, respectively, having earned at least a bachelor's degree, while only about a third of the population stopped at high school or some college without a degree.

As Table 4-12 shows, the county's residential population grew about 6.2 percent between 1990 and 1994, or an average of 1.5 percent per year. Recent growth has been slower than in the 1980s, when there was more domestic interstate migration, but still exceeded the county's growth rate in the 1970s (M-NCCPC, 1997; Maryland Office of Planning [MOP], 1997).

**TABLE 4-12**  
Population Growth Trends

Montgomery County	Household Population	Average Annual Growth	Average Annual Growth Rate	Total Growth Rate
1970	516,645	--	--	--
1980	573,421	5,678	1.1%	11.0%
1990	749,257	17,584	3.1%	30.7%
1994	795,600	11,586	1.5%	6.2%

Source: Maryland Office of Planning, Planning Data Services, August 1997, based on 1990 Census data; *except* 1994 population estimate: M-NCCPC, December 1995, 1994 Census Update Survey.

The major components of growth in Montgomery County since the 1990 Census have been international migration (over 38,000 persons) and natural increase (number of births exceeding number of deaths). Migration into the county has mostly been from outside the Washington area, although the number of households moving from the District of Columbia to Montgomery County increased from 11 percent in 1987 to 15 percent in 1990 (M-NCCPC, 1997). Net growth has been kept in check by out-migration, primarily to Frederick County, which was nearly 70 percent of the growth from international migration over the same period (MOP, 1997).

Although population has been growing at a proportionately higher rate in the outer suburbs, total growth in the inner suburbs such as Montgomery County still dominates the region. According to Cooperative Forecasts by the Metropolitan Washington Council of Governments (MWCOG), 57 percent of the region's population will continue to live in the inner suburbs in 2020 (MWCOG, 1996).

Table 4-13 illustrates population forecasts for the county and the Silver Spring area. Both the county and the Silver Spring area are expected to continue a moderate rate of growth through 2005, when the county's growth rate is expected to slow and the Silver Spring area could begin to lose population.

In 1992, when facilities in the NPSHD were still used for military housing, the residential population of the Forest Glen Annex was roughly 130 persons (based on the number of family, guest, and barracks units in use at the time and a typical family size factor of 2.5 persons). Because the former housing units in the NPSHD are no longer in use, the only on-post residents now on the Forest Glen Annex are the families of hospital patients staying in Fisher House and homeless persons using the Carroll House shelter. At any time, Forest Glen Annex can have a transient resident population of about 65 persons: up to 25 guests in Fisher House (Building 173 outside the NPSHD) and about 40 homeless residents in the Carroll House (Building 125 in the NPSHD).

**TABLE 4-13**  
Population Forecasts

Montgomery County	Planning Area # 36 <sup>1</sup>	Average Annual Growth Rate	Montgomery County <sup>2</sup>	Average Annual Growth Rate
1990	31,223	--	757,027	--
1995	33,647	1.5%	810,000	1.4%
2000	35,952	1.5%	855,000	1.1%
2005	N/A	N/A	910,000	1.3%
2010	43,000	2.0%	945,000	0.8%
2015	42,671	-0.8%	975,000	0.6%
2020	N/A	N/A	1,000,000	0.5%

Source: M-NCPPC, 1996.

1. Population in Households, from Round 5.3 Cooperative Forecast. (Round 6.0 population forecasts by Planning Areas are not yet available.) Forecasts of household population by Planning Area are not available for the year 2020. Population living in households does not include persons living in group quarters.

2. Total population, from Round 6.0 Cooperative Forecast. Forecasts are prepared every 3 to 5 years as part of the Cooperative Forecasting Process of the Metropolitan Washington Council of Governments.

In 1992, the Forest Glen Annex had a workforce (mostly daytime) population of approximately 1,150 employees, about 40 percent military and 60 percent civilian (Astore, 1992). After the WRAIR building is fully occupied in early 2000, the Forest Glen Annex will have a estimated workforce population of approximately 1,600 employees and no permanent residential population.

There are approximately 25,000 military retirees and family members living in the Washington metropolitan area. Direct military retirees and their dependents are eligible to receive medical care and some other services at WRAMC (RGH, 1994).

#### 4.13.1.2 Environmental Justice

On February 11, 1994, President Clinton issued Executive Order 12898, "Federal Actions to Address Environmental Justice in Minority and Low-Income Populations." The executive order requires federal agencies to identify and address any disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations.

For this reason, Table 4-14 presents demographic information on race, ethnicity, and poverty status in the Census block groups (subsets of Census tracts) that immediately surround the Forest Glen Annex, to provide the baseline on which any such impacts can be identified and analyzed. Statistics for the Silver Spring Planning Area and Montgomery County also are presented, to provide context.

**TABLE 4-14**  
1990 Environmental Justice Statistics

	Land Area (sq. mi.)	1990 Population	White	Black	Indian <sup>3</sup>	Asian <sup>4</sup>	Other	Hispanic Origin <sup>5</sup>	Total Minority <sup>6</sup>	Poverty Rate <sup>7</sup>	Median Household Income <sup>8</sup>
Montgomery County	494.6	757,027	77%	12%	0.2%	8%	3%	7%	28%	4%	\$54,089
Planning Area # 36 <sup>1</sup>	4.4	33,145	61%	32%	N/A	4%	3%	8%	N/A	N/A	\$42,465
<b>Block Groups Surrounding Forest Glen Annex<sup>2</sup></b>											
7027-1 (FG) <sup>2</sup>	0.6	317	87%	9%	0.0%	2%	1%	2%	14%	10%	\$76,684
7027-2 (SE)	0.3	3,817	37%	41%	0.2%	4%	18%	30%	72%	4%	\$40,760
7028-1 (NE)	0.2	947	76%	18%	0.1%	4%	2%	5%	27%	0%	\$47,206
7028-2 (NE)	0.2	941	91%	6%	0.1%	2%	1%	2%	11%	2%	\$59,204
7051-1 (W)	0.5	1,404	94%	4%	0.3%	2%	0%	2%	9%	1%	\$79,432
7051-2 (SW)	<u>0.6</u>	<u>1,716</u>	<u>92%</u>	<u>4%</u>	<u>0.1%</u>	<u>3%</u>	<u>1%</u>	<u>3%</u>	<u>10%</u>	<u>2%</u>	\$75,000
Total	2.4	9,142	67%	21%	0.2%	3%	8%	14%	38%	3%	N/A

Except as noted, all data are from the 1990 Census. Racial and ethnic groups were self-selected by Census respondents.

1. Source for Planning Area #36: 1994 Census Update Survey; percents are for population in households, not total population. Source: M-NCPPC, December 1995.

2. Census tracts are statistical subdivisions of counties and block groups are subdivisions of tracts. Census tract 7027 is subdivided into 4 block groups (7027-1 through 7027-4). Block group 7027-1 includes the Forest Glen Annex, the Forest Glen Park neighborhood on the northwest, and the mixed industrial/residential area immediately south of Forest Glen Annex.

3. Includes Eskimos or Aleutian Islanders.

4. Includes Pacific Islanders

5. Persons of Hispanic origin can be of any race and also are counted in those categories.

6. Total non-white persons and Hispanic persons of all races. (Minority groups shown above will not sum to "Total Minority.")

7. Percent of persons with 1989 incomes below the poverty threshold, as defined by the U.S. Census Bureau on the basis of family size and family income.

Race refers to Census respondents' self-identification of racial background. Hispanic origin refers to ethnicity and language, not race, and may include persons whose heritage is Puerto Rican, Cuban, Mexican, and Central or South American. As defined by "Environmental Justice Guidance Under the National Environmental Policy Act" (CEQ, 1997), the term "minority population" includes persons who identify themselves as black, Asian or Pacific Islander, Native American or Alaskan Native, or Hispanic. A minority population exists where the percentage of minorities in an affected area either exceeds 50 percent or is meaningfully greater than in the general population of the larger surrounding area.

Low-income populations are identified using the Bureau of the Census's statistical poverty threshold, which is based on income and family size. The Census Bureau defines a "poverty area" as a Census tract where 20 percent or more of the residents have incomes below the poverty threshold and an "extreme poverty area" as one with 40 percent or more below the poverty level (U.S. Census Bureau, 1995).

Census Block Group 7027-1 includes the Forest Glen Annex and the adjacent Forest Glen Park neighborhood, and is bounded on the west by Rock Creek and to the south and east by an inactive rail line, roughly one-third mile south of the Forest Glen Annex. The block groups immediately surrounding the Forest Glen Annex comprise an area of 2.4 square miles.

**Minority Population.** As Table 4-14 shows, most of the area surrounding the Forest Glen Annex does not meet the CEQ's 50 percent criteria for a minority population, but it does have a proportionately larger minority population than the county as a whole. The surrounding block groups have a total minority population of 38 percent, with 21 percent black and 14 percent Hispanic residents in 1990. Block group 7027-2, southeast of the Forest Glen Annex, has a predominately minority population. As of the 1994 Census Update Survey, the population of the Silver Spring Planning Area was 32 percent black and 8 percent Hispanic.

**Low-Income Population.** The overall area surrounding the Forest Glen Annex does not approach the criteria for a poverty area. The poverty rate was only 3 percent in 1990, which was slightly lower than the county's and considerably lower than the nationwide rate of 14.5 percent in 1990. Block group 7027-1, which includes two separate residential areas immediately north and south of the Forest Glen Annex, had the highest poverty level (at 10 percent) but also had a relatively high median income. Census Bureau poverty rate tabulations are not available for Montgomery County's planning areas, but 11 percent of the households in the Silver Spring Planning Area had a combined household income of less than \$15,000 in 1993, compared to only 5 percent countywide (M-NCPPC, December 1995).

Nationally, the total number of people living in poverty increased by an estimated 25 percent between 1990 and 1993, after the recession of the 1990s, and then decreased by 5 percent between 1993 and 1995. In Montgomery County, the estimated total number of people in poverty increased by 53 percent between 1990 and 1993, from a poverty rate of 4 percent to 6 percent. Between 1993 and 1995, the number of county residents living in poverty decreased by an estimated 9 percent, for a slightly reduced poverty rate of 5.4 percent (U.S. Census Bureau, 1998 and 1999).

**Homeless Assistance Programs.** Montgomery County Catholic Charities operates a homeless shelter, known as Carroll House, in Building 125 (Stable) in the NPSHD. Carroll House provides overnight accommodation for about 40 homeless men and some transitional housing space. Carroll House is considered a Tier Two facility in the Montgomery County Homeless Continuum of Care Plan (STV/Lyon, 1993).

#### 4.13.1.3 Labor Force

The labor force is defined as all persons 16 years or older and residing in a given place, whether employed or unemployed, but excluding full-time homemakers and students. About 75 percent of the population 16 and over in Montgomery County is in the labor force. There were 19,050 employed residents in the Silver Spring area in 1994.

As Table 4-15 shows, over half of Montgomery County's resident workers work within the county itself. Many work in employment centers outside the Beltway, such as the I-270 corridor. The District of Columbia still provides more jobs for county residents than other Maryland counties or Virginia. Employment patterns among county residents have changed little between 1987 and 1994, which can be attributed to the economic slowdown and some loss of jobs that resulted from the recession of the early 1990s (M-NCPPC, 1997).

Proportionately fewer Silver Spring residents work inside Montgomery County and more work in the adjoining District of Columbia, compared to county residents as a whole. The

majority of people drive to work, but a greater percentage of Silver Spring residents use public transit than in the countywide population. Of this urbanized area's working residents who use public transit, about 72 percent get to Metrorail stations by walking or bicycling and only 10 percent by driving, compared to countywide rates of 28 percent walking or bicycling and 49 percent driving.

**TABLE 4-15**  
Labor Force and Commuting Patterns

	<b>Planning Area # 36</b>	<b>Montgomery County</b>
Total Population 16 and over in 1995 <sup>1</sup>	N/A	627,460
In Labor Force in 1995 <sup>1</sup>	N/A	75%
Employed Residents in 1994 <sup>2,3</sup>	19,050	438,825
<b>Work Location: <sup>3</sup></b>		
In Montgomery County	37%	59%
Inside the Beltway	27%	19%
Outside the Beltway	10%	40%
Elsewhere in Maryland	8%	9%
to District of Columbia	47%	24%
to Virginia	8%	8%
<b>Work Trip: <sup>3</sup></b>		
Driving (alone or in carpool)	62%	81%
Using Public Transit	29%	13%
<b>Access to Metrorail: <sup>3,4</sup></b>		
Car	10%	49%
Ride-On/bus	19%	23%
Walk/Bicycle	72%	28%

1. Source: Maryland Office of Planning, Planning Data Services, August, 1997. Full-time students, homemakers, retirees, and others who are not working or actively seeking work are not considered to be part of the labor force.

2. Ages 16 and older and employed full- or part-time

3. Source: Montgomery County Planning Board (M-NCPPC), December 1995, 1994 Census Update Survey

4. For employed residents who use Metrorail or other rail, the primary method used to get to the station on the workday preceding the survey.

## 4.13.2 Regional Economy

### 4.13.2.1 Employment

The largest private-sector employers in Montgomery County, those employing 3,000 or more people, are Marriott Corporation, Kaiser Foundation Health Plan, Adventist Health Care,

Giant Food Corporation, and Lockheed Martin. Federal agencies employing more than 3,000 persons are the National Institutes of Health (22,000 persons), Naval Medical Command (7,300), National Institute of Standards & Technology, and the Food and Drug Administration (Montgomery County, 1998).

As of 1995, according to estimates by the U.S. Bureau of Economic Analysis (BEA), there were over 500,000 full or part-time jobs in Montgomery County (Table 4-16). The total number of jobs has increased 20 percent since 1985. There was very little net job growth between 1990 and 1995 (BEA, 1997). However, by the middle of 1998, the creation of new jobs in the county had reached its highest point since the recession of the 1990s. In 1998, unemployment in Montgomery County hit a record low of 2.3 percent, compared to 4.5 percent in Maryland (Montgomery County, 1999).

**TABLE 4-16**  
Employment by Type and Major Industry <sup>1</sup>

	1995		1985	
	Number	Percent <sup>2</sup>	Number	Percent <sup>2</sup>
Total full- and part-time employment	523,599	100.0%	438,889	100.0%
Wage and salary jobs	427,243	81.6%	377,398	86.0%
Proprietors' employment	96,356	18.4%	61,491	14.0%
Farm employment	868	0.2%	1,111	0.3%
Nonfarm employment	522,731	99.8%	437,778	99.7%
Private employment:	434,928	83.2%	358,633	81.9%
Agricultural services, forestry, fishing, other <sup>4</sup>	5,738	1.1%	4,022	0.9%
Mining	653	0.1%	802	0.2%
Construction	28,343	5.4%	29,781	6.8%
Manufacturing	18,122	3.5%	18,286	4.2%
Transportation and public utilities	15,877	3.0%	7,779	1.8%
Wholesale trade	16,258	3.1%	16,733	3.8%
Retail trade	78,508	15.0%	72,750	16.6%
Finance, insurance, and real estate	53,782	10.3%	42,084	9.6%
Services	217,647	41.6%	166,396	38.0%
Government and government enterprises:	87,803	16.8%	79,145	18.1%
Federal, civilian	43,715	8.4%	43,033	9.8%
Military	7,905	1.5%	7,069	1.6%
State and local:	36,183	6.9%	29,043	6.6%
State	1,662	0.3%	1,474	0.3%
Local	34,521	6.6%	27,569	6.3%

1. Place-of-Work employment in Montgomery County; differs from employment of county residents (Section 4.12)

2. Percent of total employment

3. Percent of nonfarm employment

4. Other: Jobs held by U.S. residents employed by international organizations in the U.S.

Source: U.S. Bureau of Economic Analysis, 1997 (Table CA25, Total Full-Time and Part-Time Employment by Industry)

Proprietors (self-employed or business owners) account for a rising share of employment in the county, 4 percent more than in 1985. Nearly all of the county's jobs are in nonfarm occupations. The private sector provides the bulk of the jobs in Montgomery County. Nearly

half of those jobs (42 percent) are in the “services” sector, which includes professional services such as information technology, as well as traditional service jobs. The retail sector provides 15 percent of the county’s jobs, followed by the government sector (17 percent) and the financial sector (10 percent) (BEA, 1997).

Total civilian employment by the federal government has increased only slightly since the reductions in force of the 1980s, and represents a declining share of overall employment in Montgomery County. However, the jobs created by federal contracting in the private sector are still an important component of growth throughout the metropolitan region.

Employment in Montgomery County is expected to continue growing slowly until 2000, averaging than 1 percent annually, with a stronger rate of growth thereafter (Table 4-17). The Silver Spring area is expected to continue losing jobs in the near term and then to begin growing steadily for the next two decades. The county’s efforts to revitalize the Silver Spring CBD will be a key factor in this projected growth. The Takoma Park area is forecasted to continue losing jobs in the near term and to recover much more slowly over the next decades (M-NCPPC, 1998c).

**TABLE 4-17**  
Employment Forecast

Planning Area	1990	Change	2000	Change	2010	Change	2020
#36 Silver Spring	41,969	-3%	40,710	12%	45,782	8%	49,245
#37 Takoma Park	9,638	-7%	8,969	4%	9,316	4%	9,721
Montgomery County	465,500	7%	500,000	16%	580,000	9%	630,000

Source: M-NCPPC, 1998c, Round 6.0 Intermediate At-Place Employment Forecast, prepared for Metropolitan Washington Council of Governments Cooperative Forecasts.

Note: Estimating method differs from BEA, above (Metropolitan Washington Council of Governments forecasts discount multiple jobs held by the same person)

#### 4.13.2.2 Income

Income can be described in several ways. Per capita income is the total personal income in an area divided by the total population. In 1995, at \$38,160, Montgomery County’s per capita income was the highest in the state of Maryland (Table 4-18). Howard County was ranked second in the state and Prince George’s County ranked 10th. By comparison, per capita income in 1995 was \$26,350 for the state of Maryland as a whole and \$23,196 for the United States. The average earnings per job in Montgomery County was \$34,659 in 1995, compared to \$28,670 for the state. Although proprietors account for a rising share of jobs, their average earnings are lower than the average earnings of people employed by others (BEA, 1997 and MOP, 1997).

Per capita income in Montgomery County grew steadily over the last two decades, but has slowed in the current decade due to a decline in the early 1990s. Future growth in per capita income is expected to be slower than in the past (Table 4-19).



**TABLE 4-18**  
Income Attributes

<b>Montgomery County</b>	<b>1995</b>
Total personal income (\$000)	\$30,841,959
Per capita personal income	\$38,160
Net earnings <sup>1</sup>	\$20,549,066
Average earnings per job	\$34,659
Wage and salary earnings per job	\$34,302
Average earnings per nonfarm proprietor	\$20,614

1. Total earnings, less personal contributions for social insurance, adjusted to place of residence  
Source: U.S. Bureau of Economic Analysis, 1997 (Table CA30 Regional Economic Profile)

**TABLE 4-19**  
Income Trends

<b>Montgomery County</b>	<b>1970</b>	<b>1980</b>	<b>1990</b>	<b>1995</b>	<b>2000</b>	<b>2010</b>	<b>2020</b>
Per Capita Income <sup>1</sup>	\$17,153	\$21,058	\$27,598	\$27,471	\$29,092	\$31,580	\$32,875
Average annual change:	—	2.3%	3.1%	-0.1%	1.2%	0.9%	0.4%

1. Adjusted for inflation to constant 1987 \$  
Source: Maryland Office of Planning, Planning Data Services, August 1997

Another way of looking at income is by household income, which is the combined income of all persons living in a household and relates to spending power (Table 4-20). Households include families living together, unrelated people living together, and single people living alone. In 1993, the median (midpoint) household income in Montgomery County (\$59,085) was considerably higher than in the Silver Spring Planning Area (\$42,465) or the statewide median of about \$43,000 (M-NCPPC, 1995, and MOP, 1997). Compared to the county as a whole, twice as many households in the Silver Spring area had a combined income of less than \$15,000 and proportionately fewer households were in the upper income brackets.

**TABLE 4-20**  
1993 Household Income

<b>Household Income Range</b>	<b>Silver Spring Planning Area</b>	<b>Montgomery County</b>
Under \$15,000	11%	5%
\$15,000 to \$29,999	21%	13%
\$30,000 to \$49,999	27%	22%
\$50,000 to \$69,999	16%	20%
\$70,000 to \$99,999	12%	19%
\$100,000 and above	13%	21%
1993 Median Household Income	\$42,465	\$59,085

Source: Montgomery County Planning Board (M-NCPPC), December 1995

#### 4.13.2.3 Fiscal Structure

In FY 1998, Montgomery County received \$2,255.4 million in revenues, of which approximately 35 percent came from property taxes, 24 percent from income taxes, 4 percent from other taxes, and 18 percent came from intergovernmental transfers (Montgomery County, 1997a).

The county's approved use of funds in FY 1998 totaled \$2,255.4 million, of which \$2,103.05 was appropriated for the Operating Budget, for an increase of 7 percent over FY 1997. Education received the largest share of the county's tax-supported funding, at 50.5 percent for Montgomery County Public Schools and 4.9 percent for Montgomery College. The county also received an increased level of state funding for school construction in FY 1998. County government received 36.8 of tax-supported funds and M-NCPPC received 3.2 percent. M-NCPPC's FY 1998 budget included \$60.2 million for tax-supported activities, plus \$10.6 million for enterprise activities and \$0.79 million for property management (Montgomery County, 1997a). The County Executive's proposed Operating Budget for FY 1999 totals \$2,254.6 million, an increase of 7.2 percent over FY 1998 (Montgomery County, 1998).

In FY 1998, the average homeowner paid \$4,365 in taxes and \$762 in fees for water, sewer, and solid waste (total revenues divided by number of households). Average property tax rates have remained the same for the past 3 years. The County Executive's proposed budget for FY 1999 recommends reducing the average property tax rate, implementing a Homeowners Tax Credit, and keeping utility rates constant in FY 1999 (Montgomery County, 1998; 1997a).

#### 4.13.2.4 Installation Contribution to Regional Economy

The Walter Reed Health Care System, which includes WRAMC and its tenants at Main Section, Forest Glen Annex, as well as satellite clinics at Fort McNair, the Pentagon, Fort Meade, and elsewhere in the metropolitan area, provided approximately 7,300 jobs in the regional economy in FY 1998, about half of which are civilian jobs. Once the new WRAIR building is fully occupied, about 1,620 (22 percent) of those jobs will be at the Forest Glen Annex (L. Harper, personal communication, May 1999). WRAMC contributes an estimated \$257.8 million annually to the regional economy of the Washington metropolitan area, which includes expenditures for supplies, services, utilities, base operations, and a payroll of approximately \$104 million (Mitchell, personal communication, May 1999).

WRAMC contributes little direct tax revenue to Montgomery County and the District of Columbia. However, WRAMC's operations indirectly provide revenue to local jurisdictions through sales taxes on local purchases, or other taxes paid by its private-sector suppliers and service providers, and through income or other taxes paid by employees who reside in the area.

#### 4.13.2.5 Residential Real Estate

As an almost completely built-out area, Silver Spring has seen very little growth in residential building completions in recent years, compared to the rest of the county (Table 4-21). New housing in Silver Spring is largely infill by nature. Most of the residential permits issued in the Silver Spring area in recent years have been for apartment units, while most of

the residential permits approved countywide during this period were for single-family houses and townhouses.

Countywide, residential permits rebounded in 1997 and 1998 from a slowdown over several preceding years. In 1998, the number of residential permits increased nearly 70 percent over 1997, with the largest increase in multifamily units. In 1997, nearly 4,000 housing units were completed (M-NCPPC, 1998d).

Countywide, the residential real estate market also improved in late 1997 and 1998, following an extended period of declining sales in 1996 and early 1997. In 1997, the county saw a 7 percent increase in the number of residential sales and a 10 percent increase in total sales value from the prior year. The 1997 median price of single family units increased for the first time since 1994. In 1998, the number of residential sales increased more than 26 percent. However, according to the March 1999 report of the county's Finance Department, this level of activity may be unsustainable over the coming years, considering the county's projected growth rate of just over 1 percent (M-NCPPC, 1998d; Montgomery County, 1999).

**TABLE 4-21**  
New Housing by Type, 1996-1997

	Silver Spring CBD Policy Area	Silver Spring/ Takoma Park Policy Area	Montgomery County
<b>Units Completed</b>			
Single-Family Units	0	50	5,077
Multi-Family Units	0	0	1,888
Total Units			6,965
<b>Permits Issued</b>			
	Silver Spring Planning Area	Takoma Park Planning Area	Montgomery County
Single-Family Detached Units	13	24	5,773
Single-Family Attached Units	0	0	2,935
Multi-Family Units	132	0	2,473
Total Units	145	24	11,181

Source: Montgomery County Department of Park and Planning, Research and Technology Center, 1999

#### 4.13.2.6 Commercial Real Estate

The Silver Spring planning area contains 11 percent of the total office space and 7 percent of the total retail space in Montgomery County (Table 4-22). Of the more than 7 million square feet of existing office space in the Silver Spring planning area, about 6 million square feet are in downtown Silver Spring.

**TABLE 4-22**  
Existing Nonresidential Development in 1995

	<b>Silver Spring Planning Area</b>		<b>Montgomery County</b>	
	<b>Square Feet</b>	<b>Acres <sup>1</sup></b>	<b>Square Feet</b>	<b>Acres</b>
Industrial	557,905	23	5,066,342	1,011
R&D	0	0	361,242	102
Office	7,360,121	118	69,195,031	3,703
Retail	2,087,501	72	28,101,138	2,573

1. Acreage includes only existing developed land as of January 1995; it does not include vacant land zoned for this use.

Source: Montgomery County Planning Department, Research & Information Systems Division, June 14, 1995. Compiled from data provided by the Maryland Department of Assessment & Taxation.

Silver Spring's commercial vacancy rates have been the highest in Montgomery County, but recently are beginning to show signs of improvement. In 1994, when commercial real estate was depressed in nearly all markets, Silver Spring had a vacancy rate of 25.9 percent, compared to 11.4 percent countywide. By the spring of 1999, Silver Spring's vacancy rate was 17 percent (down 34 percent from 1994), compared to 5.2 percent countywide (down 53 percent from 1994).

A 1997 study, *Economic Health and Prospects for Class B and C Office Buildings in Montgomery County, Maryland*, found that the County's market for office space is moving out of the "recovery" phase (following the recession) and into the "expansion" phase, which has been confirmed by recent trends. With declining vacancies in office, flex and industrial space, new construction in Montgomery County began to increase in 1998 and 1999. Over 8.8 million square feet of commercial space was approved in 1998 (roughly 25 percent office space), more than triple the space approved in 1997, and nearly 2 million square feet of commercial space was completed. Under the FY 1998 Annual Growth Policy, the county has the transportation capacity for 158,100 additional jobs in already-approved and yet-to-be approved development (Montgomery County, 1999; M-NCPPC, 1998d).

Although the 1997 office space study identified downtown Silver Spring as a lingering problem area, the report predicted that tightening submarkets elsewhere in the county's urban core will cause market spillover into Silver Spring, which could be encouraged by a clear public sector commitment to invest in and improve the development climate. Recent anecdotal evidence suggests that those findings were essentially correct and that some businesses are beginning to relocate from Chevy Chase and Bethesda to Silver Spring, because it offers more available space (although perhaps in need of more renovation), lower rents, and continued access to Metro (Haggerty, 1999; M-NCPPC, 1997d).

As might be expected, there have been relatively few permits issued for new office and other nonresidential developments in Silver Spring in recent years. Between 1995 and 1998, new

permits issued in the Silver Spring represented only 4 percent of existing office square footage, compared with 14 percent countywide (Table 4-23).

**TABLE 4-23**  
Nonresidential Subdivisions Approved in 1995-1998

	<b>Silver Spring CBD Policy Area</b>	<b>Silver Spring/ Takoma Park Policy Area</b>	<b>Montgomery County</b>
Office	215,400	19,200	9,583,929
Retail	440,400	0	2,122,008
Industrial/Warehouse	0	19,200	335,615
Other	324,215	0	527,095

(Square Feet)

Source: Montgomery County Department of Park and Planning, Research and Technology Center, 1999

In 1998, however, over 30 businesses moved to or expanded within downtown Silver Spring, accounting for approximately 1,500 employees and more than 400,000 square-feet of occupied office and commercial space. Renovation of the Silver Spring Plaza alone returned 238,000 square feet of space to more productive use. (Montgomery County, 1998; M-NCPPC, 1998d).

As the revitalization of Silver Spring progresses, spurred by several highly visible public and private investment projects, the relative affordability and newly perceived attractiveness of downtown Silver Spring should spur more demand for commercial space and the commercial real estate market should continue to improve. In turn, redevelopment of the Silver Spring CBD is expected to have a “trickle-down effect” on demand for space in nearby neighborhood-type commercial centers, such as the Montgomery Hills area near NPSHD (Haggerty, 1999; M-NCPPC, 1997d; M-NCPPC, 1998).

#### 4.13.2.7 Silver Spring Revitalization

In 1997, Maryland designated the Silver Spring Central Business District as an Enterprise Zone, which allows businesses to earn tax credits for creating new jobs in the zone.

Also in 1997, Montgomery County entered into a joint development plan agreement with a group of local developers for the Silver Spring “Town Center” project: a mix of retail, office entertainment, hotel, and residences, on a 26-acre site in the central core of downtown Silver Spring. This site has been vacant for many years and has been the focus of several ambitious redevelopment proposals in the past, which failed to win county support.

Developers that have committed to the project so far include Fresh Fields supermarket and Edwards Theaters, which is planning an 18 to 20-screen multiplex on the site. Near the “Town Center” site, Discovery Communications plans to construct a 600,000-square-foot headquarters building to house over 1,000 employees and the American Film Institute will lease the historic Silver Theater after the County spends \$7.8 million to restore it and develop an adjacent facility. The Silver Spring “Town Center” project, which is expected to cost \$321

million to develop including \$132 million in public funding, celebrated its ground-breaking in April, 1999, and is expected to be complete in 3 years (M-NCPPC, 1998; Haggerty, 1999).

### 4.13.3 Quality of Life

#### 4.13.3.1 Housing

**Off-Post Housing.** As of 1997, Montgomery County had nearly 320,000 housing units, half of which were single-family detached units and the rest were townhouses, duplexes or multiplexes, and apartments (Table 4-24). In the Silver Spring area, two-thirds of existing housing units are apartments. In addition, the Takoma Park Planning area has an estimated 12,414 housing units. According to the FY 1998 Annual Growth Policy, the Silver Spring-Takoma Park Policy Area still has sufficient capacity in public facilities to accommodate some additional housing growth.

TABLE 4-24  
Housing Units

	Planning Area # 36	Montgomery County
<b>Estimate of Existing Housing Units:<sup>1</sup></b>	16,621	319,111
Single-Family Detached	32%	52%
Town-House or Duplex	2%	17%
Multi-Family	65%	31%

1. As of 1997. Source: M-NCPPC, April 1998

Calculations of net remaining capacity as of November 1997, including existing and pipeline housing, estimated a net remaining capacity for about 2,300 housing units within the combined Policy Area. Specific locations where such development could occur will be subject to zoning and master planning.

The Silver Spring area has proportionately more rental housing than the county as a whole and more units with only two bedrooms, both of which factors are consistent with Silver Spring's higher proportion of apartments (Table 4-25). Average rents are slightly lower than the county average, but nearly half of all renters still spend more than 25 percent of their income on housing, which is considered to be financially burdensome (M-NCPPC, 1995).

**On-Post Housing.** There is currently no military housing at the Forest Glen Annex, although the NPSHD provided some unique military housing units for a number of years. WRAMC currently has about 875 quarters for unaccompanied enlisted personnel (including students), most of which are at the Main Section in Washington, and 218 military family housing units, most of which are at the Glen Haven Section in Montgomery County (see Figure 1-1). The waiting list for on-post family housing averages about 2 months for 2-bedroom units and 12 months for larger units (WRAMC, 1999).

Most of the military personnel assigned to WRAMC are housed off-post, largely through the Set-Aside Housing Program. Under this program, property management companies and

WRAMC negotiate an agreement to provide rental housing. The soldiers' Basic Allowance for Quarters (BAQ) and Variable Housing Allowance (VHA) are paid directly to the property management companies. This arrangement provides better quality housing, with more amenities, at lower cost to the government and is in line with current DOD policy to privatize military housing services as much as possible (Porter, personal communication, 1998).

**TABLE 4-25**  
Housing Characteristics

	Planning Area # 36	Montgomery County
Rental Housing Units	61%	28%
Average Number of Bedrooms	2.2	3.1
In Same Home 5 Years	44%	56%
Homeowners' Average Monthly Housing Costs	\$1,076	\$1,150
Renters' Average Monthly Housing Costs	\$736	\$783
Homeowners Spending > 25% of Income on Housing	20%	22%
Renters Spending > 25% of Income on Housing	49%	47%

Source: M-NCPPC, December 1995, 1994 Census Update Survey

A limited amount of temporary military housing is available at WRAMC's Guest House and visiting officer's quarters (Walter Reed Inn), both at the Main Section. The two Zachary and Elizabeth Fisher Houses, at the Forest Glen Annex and the Main Section, provide temporary affordable housing with a family environment for the families of patients undergoing long-term care at the Walter Reed Hospital. Mologne House at Main Section provides 200 hotel rooms, along with meeting and banquet facilities used by WRAMC tenant activities. The hotel is operated primarily for Walter Reed outpatients and their families, but other active and reserve military personnel, retirees and DOD civilians may use rooms when they are available (WRAMC, 1998b).

#### 4.13.3.2 Schools

**Off-Post Schools.** There are many public and private schools in the vicinity of the NPSHD. The public schools closest to the NPSHD are Woodlin Elementary on Brookville Road to the east, Rosemary Hills Elementary to the south, and Oakland Terrace Elementary to the north. Rosemary Hills is a magnet school and thus does not have a geographically fixed attendance area. Until recently, the Hebrew Academy of Greater Washington on Brookville Road was the nearest private school. That school is moving to a new facility and the building (the former Montgomery Hills school) is expected to be put to another community use.

Montgomery County Public Schools (MCPS) operates 123 elementary, 32 middle, 21 high schools, 6 special schools, and a Career and Technology Center. The estimated countywide enrollment for the 1997-1998 school year was 125,538 students, an increase of 2.4 percent over the 1996-1997 school year. The number of MCPS students has increased nearly a third since

1982. By the 2000-2001 school year, total enrollments are projected to exceed 130,000 students. An estimated 82 percent of the county's students attended public schools in the 1996-1997 school year (MCPS, 1998).

Montgomery County schools are organized into clusters, according to which high school the elementary and middle schools feed into. Woodlin Elementary is part of the Albert Einstein Cluster, which includes Sligo Middle School. Albert Einstein High School, which is located in Kensington about 2 miles north of NPSHD, was recently modernized and enlarged to a student capacity of 1,550. Rosemary Hills Elementary and Oakland Terrace Elementary are part of the Bethesda-Chevy Chase Cluster, which includes Westland Middle School near Glen Echo. Bethesda-Chevy Chase High School is located on East-West Highway, about 3.5 miles southwest of NPSHD.

The Montgomery Blair Cluster serves much of Silver Spring and the City of Takoma Park, to the east of NPSHD. In the fall of 1998, Montgomery Blair High School opened its new building in the Four Corners area (on Colesville Road just north of the Capital Beltway), with a student capacity of 2,800. The existing Blair site on Wayne Avenue will be used for a new elementary school and a middle school, expected to open in 1999, which will help accommodate additional students from the portion of Takoma Park that was formerly part of Prince George's County (MCPS, 1998).

According to the county's FY 1998 Annual Growth Policy, the student capacity of the schools in the three clusters surrounding the NPSHD are expected to remain within an acceptable range (for planning purposes) into the near future. However, some of these schools are nearing their capacity limits: middle schools in the Bethesda-Chevy Chase and Einstein Clusters, and elementary and high schools in the Blair Cluster (M-NCPPC, 1997). Anecdotally, some of these schools are beginning to experience crowded conditions (*Washington Post*, April 1999).

There are many technical schools, colleges, and universities in the surrounding area, including Montgomery College in Takoma Park, Rockville and Germantown; the Maryland College of Art and Design in Silver Spring; the University of Maryland in College Park; and Georgetown, George Washington, Catholic, Howard, and American Universities in Washington, D.C.

**On-Post Schools.** There are no on-post elementary or secondary schools at any of the three sections of WRAMC, but there is a child care center in the Forest Glen Annex's Community Center complex. WRAMC offers a variety of educational and training services to its military and civilian employees, both on and off-post.

#### 4.13.3.3 Shops and Services

**Off-Post.** Numerous shops and services are available near the NPSHD. Neighborhood retail, food and other service establishments can be found along Georgia Avenue and in downtown Silver Spring. The closest commercial center to the Forest Glen Annex is Montgomery Hills, an older commercial district located along both sides of Georgia Avenue around the Georgia Avenue/Seminary Road/16<sup>th</sup> Street intersections. Retail businesses in Montgomery Hills are roughly half neighborhood (serving the daily needs of local residents) and half regional (specialty stores like Staples and Washington Golf Center) in nature (M-NCPPC, 1998).



The ongoing revitalization of the Silver Spring CBD will increase nearby shopping and entertainment opportunities. Downtown Chevy Chase, Washington, and several major regional shopping centers provide a wide variety of consumer goods, restaurants, and professional services. Hotels and motels are abundant in the surrounding area.

There are many churches, synagogues, and other houses of worship in the area, including several very close to the Forest Glen Annex. The Washington Mormon Temple, on Stoneybrook Drive about 0.5 mile northeast of the NPSHD, is one of the area's major religious institutions.

The nearest Montgomery County public library is the Silver Spring Branch Library on Colesville Road, about 1.5 miles east of the Forest Glen Annex.

**On-Post.** Shops and services in the Community Center complex at the Forest Glen Annex are provided by the commissary (food store) and the post exchange (PX) facilities, which include an all-purpose retail store, a gas station, a cafeteria and other concessions, a military clothing sales store, and a bank.

Additional services are available at the Main Section, including a barber shop, beauty salon, café, laundry and dry cleaner, PX shoppette, credit union, flower shop, a cafeteria for military and civilian employees and hospital patients, and a post office. WRAMC operates a Post and Patients' Library in Building 2 at the Main Section, and several medical libraries. The Auto Craft Shop at the Main Section provides space and supplies for self-help auto care. On-post facilities are available to service members, their families, retirees, and DOD civilian personnel (WRAMC, 1998b).

#### 4.13.3.4 Medical Facilities

There are ample medical facilities in the vicinity of the NPSHD. The nearest hospital and emergency room is Holy Cross Hospital in Silver Spring, located on Forest Glen Road just north of the Capital Beltway, about 1 mile northeast of the NPSHD. Suburban Hospital, which is located next to the National Institutes of Health (NIH) on Old Georgetown Road in Bethesda about 3 miles west of the NPSHD, is the Emergency Shock Trauma Center for Montgomery County. The Forest Glen Annex has a helipad available for MEDEVAC use.

The military hospitals closest to the NPSHD are the National Naval Medical Center, which is adjacent to NIH in Bethesda about 2 miles to the west of NPSHD, and Walter Reed Hospital at WRAMC's Main Section in Washington, about 3 miles to the south of NPSHD.

Nearly every kind of medical and dental care is available at WRAMC's Main Section. The Walter Reed Health Care System provides medical and dental services to military personnel, dependents, retirees, and certain government officials in the metropolitan Washington area, within a radius of about 40 miles. The system includes the Walter Reed Hospital and two satellite health clinics at the Pentagon and at Fort McNair in Washington, D.C. More than a million patients per year visit Walter Reed Hospital and its two satellite clinics. The Walter Reed Health Care System also encompasses DeWitt Army Community Hospital at Fort Belvoir, Virginia, Kimbrough Ambulatory Clinic at Fort Meade, Maryland, and 13 satellite clinics (WRAMC, 1998b).

#### 4.13.3.5 Recreation

**Parks.** Montgomery County has 28,000 acres of park land (Table 4-26), offering a variety of passive and active recreation, educational activities, natural and cultural history, and special events, as well as some unique facilities that can be rented for meetings, conferences, and weddings. The M-NCPPC develops and maintains park facilities in Montgomery County (and also Prince George's County), but the Montgomery County Recreation Department operates the active recreation programs. Parks are classified by type: county-wide parks are larger parks that serve regional recreation or conservation needs, while community-use parks are smaller parks that are primarily used by nearby residents (M-NCPPC, 1998a).

TABLE 4-26  
Montgomery County Parks

Type	Description and Typical Facilities	Number	Acres
<b>County-Wide Parks</b>			
Stream Valley Parks	Greenway corridors: conservation areas, hiking and riding trails, clusters of recreation parks in urban areas	30	11,983
Regional Parks	Large natural areas with playgrounds, athletic, golf, camping, picnic, and other facilities	5	7,827
Recreation Parks	Developed: ballfields, tennis, picnic, playground	10	2,709
Conservation Areas	Environmental preservation, passive recreation	9	2,167
Special Parks	Historic or culturally significant features	13	879
<b>Subtotal</b>		<b>67</b>	<b>25,565</b>
<b>Community-Use Parks</b>			
Urban Parks	Landscaped buffers: sitting, playgrounds, concerts	22	22
Neighborhood Parks	Walk-to parks: sitting, playground, tennis, basketball	83	595
Local Parks	Parks with athletic fields for reserved game play	140	1,928
Neighborhood Conservation	Undeveloped open space set aside in subdivisions	32	244
<b>Subtotal</b>		<b>277</b>	<b>2,789</b>
<b>Total</b>		<b>344</b>	<b>28,354</b>

Source: M-NPPC, 1998a

Montgomery County also contains many parks and recreation areas maintained by individual municipalities, such as the City of Takoma Park, by the National Park Service, and by the state; reservoir watersheds owned by the Washington Suburban Sanitary Commission that can be used for recreation; open space areas preserved by private organizations such as the Izaak Walton League; and conservation easements on private land that are held by the Maryland Environmental Trust (M-NCPPC, 1998a).

Parks close to the NPSHD include the Rock Creek Regional Park, an extensive stream valley park with hiking and biking trails, tennis courts, golf courses, and nature centers, immediately west of the Forest Glen Annex; Rosemary Hills Park, a local park to the south;

Sligo Creek Park, a stream valley park, and Sligo Creek Golf Course to the west; and Rock Creek Hills, a local park to the north.

**Recreational Programs.** The Montgomery County Department of Recreation offers a variety of recreational programs to county residents, including organized sports, aquatics, camps, exercise and art classes, and teen and senior adult programs.

**Recreational Needs.** The county's 1998 draft *Park, Recreation, and Open Space Master Plan Update* (M-NCPPC, 1998a), which examines recreational needs to year 2010, found that additional facilities are most needed in the areas with the highest population growth, mainly the I-270 and Route 29 corridors and the Travilah area of northern Montgomery County. However, Silver Spring, Takoma Park, and Bethesda also showed a high need for additional ballfields. Because ballfields require large areas of land, this need will be difficult to meet in these urbanized areas and may be addressed by increasing the effectiveness of current facilities, by improving the maintenance of school ballfields and making usage permits for teams more efficient.

Countywide, the need for ballfields is the greatest among all recreational facilities (101 needed in local parks and 18 in countywide parks by 2010), followed by playgrounds (56 local and 3 countywide), basketball courts (48 in local parks), tennis courts (9 in local parks) and swimming pools (9 new regional facilities). The draft master plan also recommends balancing the preservation of sensitive natural and cultural areas with the development of recreational facilities (M-NCPPC, 1998a).

**Historic Resources in County Parks.** The M-NCPPC has become the largest single owner of historic resources in the county. Over 100 historic sites are located throughout the parks system, many in regional, stream valley and special parks. Interpretive programs at historic sites, including plaques, exhibits, tours and special events, provide a special kind of recreational experience—sometimes called “heritage tourism”—for visitors and volunteers. In a 1997 survey, about 30 percent of county residents said they had visited an historic site in a Montgomery County park in the last year, 65 percent rated the protection of historic buildings and sites as important to them, and 57 percent ranked it as their highest or next-to-highest funding priority (4 or 5 on a scale of 1 to 5) (M-NCPPC, 1998a).

The 1998 draft *Park, Recreation, and Open Space Master Plan Update* recommends increasing the county's educational and interpretive programs, both to increase public awareness and to meet the public's recognized interest in recreational opportunities at historic sites. The highest priority is placed on sites with the highest visibility, accessibility, and historic importance. The draft master plan identifies 23 historic sites in county parks that could benefit the most from renovation work, as well as interpretive programs, on the basis of high public interest, accessibility, and conservation needs (M-NCPPC, 1998a).

Because funding for historic preservation is limited to about one percent of the total parks program, the county has initiated several programs to help with preservation needs, including public/private partnerships, where structures are leased to private entities at a low rate in exchange for compatible renovation; park property management arrangements, where rental money is dedicated to historic repairs; and cooperative ventures between community groups and developers (M-NCPPC, 1998a).

**Special Facilities.** The county also operates revenue-generating “enterprise facilities” that are primarily supported by user fees, including golf courses, ice rinks, indoor tennis facilities and special facilities that are rented out for weddings, conferences, and social events (Table 4-27). In FY 1996, a total of 1.3 million user visits were made to 28 of these enterprise facilities and activities. Of that total, nearly 133,000 (1.5 percent) were user visits to the special facilities described in Table 4-27 (M-NCPPC, 1997c).

TABLE 4-27  
Montgomery County Special Facilities

Facility	Description and Usage	Capacity	Rental Costs <sup>1</sup>
Armory Place (Silver Spring, near the Metro)	Converted National Guard armory, used for banquets and large events; was not self-supporting; recently demolished as part of Silver Spring CBD redevelopment	300-350 seated; 445 standing	\$65-\$85 meeting rooms; \$800-\$1,200 ballroom
Lodge at Little Seneca Creek (Boys, northern county)	Rustic, nonhistoric building built from a log cabin kit; used for meetings, weddings, parties	150 seated; 175 standing	\$500-\$900
Rockwood Manor Park (Potomac)	Elegant, multi-use historic facility with overnight accommodations for groups; Manor House and grounds, Skyview Lodge, French House, cabins	150-250 seated; sleeps 72	\$1,400-\$1,700 Manor House; \$250-\$600 meeting rooms; \$8-\$50 lodging
Woodlawn Manor Park (Sandy Springs)	Colonial house with extensive grounds, often used for tented weddings and receptions	125 indoor; 250 outdoor	\$700-\$1,200
Waters House	Historic dwelling donated in FY 1997, will be available for limited use	N/A	N/A

1. Rates vary for various rooms or entire facility and weekdays to weekends  
Source: Hedrick, 12/5/97; M-NCPPC, 1997b

**On-Post Recreational Resources.** Forest Glen Annex has a bike and walking path along South Ireland Drive that connects to hiking/biking trails in Rock Creek Park. Additional passive recreational opportunities exist in the undeveloped areas of Forest Glen Annex, which are heavily wooded and often steeply graded. Because Forest Glen Annex is open to the public, these passive recreational areas are accessible for use by the public as well as by WRAMC personnel (Woolpert, 1999; RGH, 1990). The NPSHD itself provides recreational value to the community, through the regular and well-attended walking tours, organized by Save Our Seminary, that emphasize the aesthetic, historic and cultural value of the property. The features of the NPSHD have inspired paintings and drawings by local artists.

The Forest Glen Annex also has two softball fields, a multi-purpose games court, and several picnic areas, for use by Army personnel, temporary residents, and guests. The Community Center (Building 163) at the Forest Glen Annex includes an eight-lane bowling center and an arts and crafts center, which carries supplies and provides a wood shop, ceramic studio, photo lab, framing shop, jewelry workshop, and a fine-arts studio. The Outdoor Recreation program at Forest Glen organizes and supplies equipment (at a nominal cost) for skiing, camping, boating, fishing, canoeing, golf, and other outdoor activities. WRAMC also offers

organized team sports programs for employees and youth and a leisure program for hospital patients and their families.

The Main Section has a fitness center, a mini-gym, indoor swimming pool, recreation center, and two ball courts. The Community Center at Glen Haven offers dance and exercise classes for military residents. There is an Officers Lounge in the Walter Reed Inn at the Main Section, along with an NCO and Enlisted Club. Mologne House at the Main Section provides facilities suitable for banquets and wedding receptions (WRAMC, 1998b).

#### 4.13.4 Public Safety

WRAMC provides its own police and fire protection services, under the direction of the Provost Marshal. The Provost Marshal's office at Forest Glen is located in the Community Facilities area, in the center of the Forest Glen Annex, but will be moved to a consolidated facility when the new fire station is built to replace Building 121 in the NPSHD. Both police and fire services are supported by mutual aid agreements between WRAMC and Montgomery County, for the Forest Glen Annex, and the District of Columbia, for the Main Section.

##### 4.13.4.1 Law Enforcement Services

**On-Post.** Police protection at WRAMC's Forest Glen Annex and Main Section is provided by 12 civilian police officers on active duty during each of three 8-hour shifts; three of these officers—a desk sergeant and 2 patrol officers—are based at the Forest Glen Annex (WFD, 1999). WRAMC plans to hire up to 15 additional officers to support WRAIR when the new facility is occupied (Harper, personal communication 1999).

**Off-Post.** The closest Montgomery County police station is the Silver Spring District Station, which is about 3 miles southeast of the NPSHD. This station has about 120 police officers, who regularly patrol in the Forest Glen area. The Montgomery County Park Police provide law enforcement in county parks, such as Rock Creek Regional Park next to the Forest Glen Annex. The Maryland State Police are primarily responsible for law enforcement on the Capital Beltway. The State Police serving Montgomery County are based at Barracks "N" in Rockville (Maryland State Police, 1998).

##### 4.13.4.2 Fire Protection and Emergency Services

**On-Post.** Fire protection and prevention services at the Forest Glen Annex are provided from the Fire Station located in NPSHD Building 121 (Carriage House). The Fire Station has one fire truck, a 1,000-gallons-per-minute pumper. The WRAMC Fire Department at Forest Glen has 10 full-time firefighters, who work in two 24-hour shifts of four firefighters (with one off); the Fire Department will be increased to 11 full-time firefighters when the new WRAIR facility is fully occupied, but there are no plans to expand beyond a single-engine company (Astore, 1992; WRAMC Fire Department, personal communication 1999).

A new WRAMC fire station is programmed to replace Building 121 in the NPSHD and will be located near Building 606, in the Maintenance area near Brookville Road and the southern boundary of the Forest Glen Annex. The new fire station will be larger (5,900 square feet) than the existing fire station (3,783 square feet) and will provide more up-to-date operational

facilities, including drive-through fire equipment stalls and sleeping and dining space for firefighters on duty. It also will consolidate space for the fire department and the Provost Marshal (police) into a single facility (Astore, 1992, and Porter, personal communication, 1998).

If the NPSHD is transferred to a new owner before the new fire station is completed, the WRAMC Fire Department plans to continue using the existing fire station in Building 121 under a lease from the new owner. The WRAMC Fire Department at Forest Glen will maintain coverage within a 1-mile radius of the fire house indefinitely (Chief Kidwell, personal communication, May 27, 1999).

**Off-Post.** The nearest Montgomery County fire station is the Silver Spring Fire Department (Company 19), on Seminary Road about 1 mile from the NPSHD. Company 19 has 6 full-time fire fighters in 24-hour shifts, with one fire engine, an emergency rescue tower, and ambulance (Silver Spring Fire Department, personal communication, June 2, 1999). The Silver Spring Fire Department currently provides fire protection services to the off-post residential and commercial areas surrounding the Forest Glen Annex.

#### 4.13.4.3 Mutual Aid Agreements

Under the terms of a 1993 Memorandum of Understanding (MOU) between WRAMC and Montgomery County Fire and Rescue Services, WRAMC's Forest Glen Fire Station will provide assistance to the local community, when specifically requested by a representative of Montgomery County Fire and Rescue Services. On request from a representative of the WRAMC Fire Department, the Montgomery County Fire Department will be provided, if available, to assist WRAMC's Forest Glen Fire Station with fire fighting and to provide emergency medical services.

Under a 1997 MOU between WRAMC and the Montgomery County Department of Police, military and WRAMC civilian police provide routine patrol, respond to all calls for police service, and investigate traffic accidents and crimes. The Montgomery County Department of Police has primary investigative responsibility for serious crimes (excluding misdemeanor theft) and is the primary agency responsible for police services related to the Carroll House homeless shelter, provides supplementary patrol service on the main roadways of Forest Glen Annex, and provides backup police service and support services (such as K-9) on request.

# 5. Environmental and Socioeconomic Consequences

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## 5.1 Introduction

This section describes the environmental consequences of implementing the Army's proposed action and alternatives presented in Section 3 "Alternatives" in reference to the resources described in Section 4 "Affected Environment." The proposed action is equivalent to and is addressed in this section as Alternative 1. The Army's preferred alternative for implementing the proposed action is Alternative 2.

### 5.1.1 Definition of Key Terms

#### 5.1.1.1 Significance

Criteria for evaluating potential impacts and determining their significance are specified in the CEQ regulations (40 CFR 1508.27). This code states that significance is determined by the intensity or severity of the impact and the context in which it occurs. Intensity criteria are based on the following:

- The degree to which the action affects public health or safety
- The degree of changes to unique geographic characteristics, such as visual quality, prime agricultural land, archeological sites, wetlands, or ecologically critical areas
- The potential for environmental or scientific controversy
- The known or unknown level of risk
- The potential for establishing a precedent for future actions or representing a decision in principle about a future consideration
- The relation of the impact to other actions, individually insignificant but with a cumulative impact
- The proximity of the action to resources that are legally protected by various statutes such as wetlands; resources listed in the NRHP; regulatory floodplains; and federally listed threatened or endangered species
- The potential for violating federal, state, or local laws or requirements that are in place to protect the environment

In addition, the significance of an impact should be assessed in the context of society as a whole, affected interests, or the affected region and locality. The size of the area potentially affected defines the appropriate context or area of influence for each resource. Duration of the impact (short-term or long-term) should be considered.

Using these criteria, the following levels of impacts can be identified:

- **Little or no impact.** Implementing the action will have little or no effect on the resource.
- **Not a significant impact.** Implementing the action will have an impact, either adverse or beneficial, but it does not meet the significance criteria for the given resource relative to intensity and context.
- **Significant impact.** The predicted impact, either adverse or beneficial, meets the significance criteria for the given resource. Significant impacts may be reduced to an insignificant level by implementing appropriate mitigation measures.

A brief discussion of significance criteria for each resource area follows.

- **Land Use.** If an alternative conflicted with adopted plans and goals of the community or if it resulted in a substantial alteration of the present or planned land use of an area, it could have a significant effect. If an alternative resulted in new development or prevented new development elsewhere, it could have an indirect impact.
- **Social and Economic Environment.** An alternative could have a significant impact if it altered substantially the location and distribution of population; caused the population or regional economy to exceed historic growth rates; reduced the number of jobs so as to substantially raise the regional unemployment rates or reduce income generation; substantially affected the local housing market and vacancy rates; created a need for new or substantially increased school, fire, police, or medical services; or decreased public service capacity so as to jeopardize public safety.
- **Utility Systems.** An alternative could have a significant impact on a utility if it increased demand over capacity, requiring a substantial expansion of the system, or if it resulted in substantial deterioration to the system.
- **Noise.** An alternative could have a significant noise impact if it generated new sources of substantial noise, increased the intensity or duration of noise levels to sensitive receptors, or resulted in exposing more people to high levels of noise.
- **Traffic.** An alternative could have a significant impact on traffic if it increased the volume of traffic beyond the existing road capacity, caused parking availability to fall below minimum local standards, or required new or substantially improved roadways or traffic control systems.
- **Air Quality.** An alternative could have a significant impact on air quality if it resulted in substantially higher air pollutant emissions or exceeded air quality standards.
- **Hazardous Materials, Waste, and Site Remediation.** An alternative could have a significant impact if it resulted in a substantial increase in generating hazardous wastes, exposing the public to hazardous or toxic substances, the possibility of hazardous or toxic materials being released into the environment, or if it restricted property use substantially due to hazardous waste, materials, or site remediation.
- **Water Resources.** If an alternative reduced the quantity or quality of water resources below established standards for existing or potential future uses, it could have a



significant impact. Such uses include, but are not limited to, human consumption, irrigation, recreation, protection of wildlife, or aesthetics. An alternative also could significantly affect water resources if it caused substantial flooding or erosion, if it adversely affected a significant water body, such as a stream or lake, or if it substantially reduced the quality or quantity of surface water or groundwater.

- **Geology.** An alternative could have a significant impact if it resulted in an increased geologic hazard, such as seismic shaking, land subsidence, and slope instability, or a change in the availability of a geologic resource, such as soils, mineral deposits, geothermal resources, and geomorphic features.
- **Biological Resources.** The effect of an alternative on biological resources could be significant if it resulted in disruption to or the removal of an endangered or threatened species, or its habitat, its migration corridors, or its breeding areas. The loss of a substantial number of individuals of plant or animal species (sensitive or nonsensitive species) that could affect abundance or diversity of that species beyond normal variability also could be considered significant. The measurable degradation of sensitive habitats, particularly wetlands, would be significant.
- **Cultural Resources.** Impact assessment for cultural resources focuses on the properties that are listed in or are considered eligible for the NRHP or that have been designated as National Historic Landmarks, and resources that are considered sensitive by Native American groups and the local community. Unlike NEPA, however, the NHPA addresses "adverse" effects to historic properties, not "significant" effects. A finding of adverse effect on a historic property does not necessarily require an EIS under NEPA (40 CFR 800.8 (a)). Adverse effects on cultural resources include the unauthorized collection of artifacts; vandalism to identified important sites; modifying or demolishing an historic building or environmental setting; promoting neglect, resulting in the deterioration or destruction of resources; audio or visual intrusion; or decreased access to traditional Native American resources.

An alternative could have a significant impact if the Section 106 consultation process is unsuccessful in resolving adverse effects on historic properties. Potentially significant impacts to historic properties may be reduced to insignificance by measures such as recordation of buildings and structures, archeological mitigation excavations (final data recovery), or other actions, if they are taken in consultation with the SHPO or ACHP, in accordance with the NHPA.

- **Visual Resources.** An alternative could have a significant impact on visual resources if the scale of the project contrasted with its surrounding (e.g., contained structures of greater bulk than those in surrounding areas, or introduced voids, such as parking lots, into the midst of well-defined developed or well-defined vegetative areas). The magnitude of the impacts would be greater in areas with a recognized visual character that is perceived by the community as an asset. A significant impact also would occur if the project disrupted important public views, such as views of mountains, ocean, rivers, or significant man-made structures.

### 5.1.2 Direct Versus Indirect Impacts

The terms *impact* and *effect* are synonymous as used in this EA. Impacts may be considered beneficial or adverse, and may apply to the full range of natural, aesthetic, historic, cultural, and economic resources of the installation and its environs. Definitions and examples of direct and indirect impacts as used in this document are as follows:

- **Direct impact.** A direct impact is defined as one caused by the alternative being considered and occurs at the same time and place.
- **Indirect impact.** An indirect impact is defined as one caused by the alternative being considered, that is later in time or farther removed in distance (from the project site) but is still reasonably foreseeable, or one performed by others as a consequence of the Army's action. Indirect impacts may include induced changes in the pattern of land use, population density or growth rate, or related effects on air, water, and other resources that may develop as a result of the Army's actions.

### 5.1.3 Short-Term Versus Long-Term Impacts

In addition to indicating whether impacts are direct or indirect, this EA also discusses when an impact is short-term, long-term, or sustained. The definitions of these terms are:

- **Short-term impact.** This impact is immediate and of temporary duration. Generally, these impacts are associated with construction or demolition activities, such as construction noise or fugitive dust.
- **Long-term impact.** This impact occurs at a later date and may occur gradually. For example, severe deterioration of buildings under the no-action alternative will take time to develop.
- **Sustained impact.** This impact is immediate and continues until other factors occur. For example, implementing "mothballing" procedures will immediately begin to slow the deterioration of buildings, an impact that will remain for an extended time.

## 5.2 Land Use

### 5.2.1 Alternative 1: Excessing the NPSHD

**Direct.** There will be no direct impacts to land use from Alternative 1. This alternative would begin the screening and disposal process for the NPSHD. The Army will retain ownership and control of the property until a new owner is found. No changes to existing onpost or surrounding land uses will result from the preparing a Report of Excess and interim maintenance activities before transfer or disposal.

**Indirect.** Excessing the property will allow for its eventual transfer or disposal and, ultimately, its reuse by new owners other than the Army. Depending on the type of reuse selected, the future use of the property could be different from the historic land uses and zoning of the property. Both the site and adjacent areas are currently zoned for residential use (R-90), which will take effect if the parcels leave federal ownership. However, that

zoning category does not match the past use of the property or the existing buildings on it. If the future use is incompatible with the adjacent properties, an adverse impact on land use would result.

If GSA's screening results in the property being transferred to another federal agency, that agency will be required to consult with the National Capital Planning Commission (NCPC), under Section 5(a) of the National Capital Planning Act of 1952, before making a commitment to acquire the property or preparing construction plans. NCPC is the central planning agency for the Federal government in the National Capital Region, which consists of the District of Columbia and surrounding jurisdictions, including Montgomery County. Federal planning goals for this region are detailed in the *Comprehensive Plan for the National Capital*. NCPC reviews all proposed federal development plans in the region and, where appropriate, refers those plans to local planning agencies (such as M-NCPPC) for intergovernmental review and comment before acting on them. This affords local agencies a chance to influence federal agency reuse plans and to identify any potentially incompatible reuse proposals made by federal agencies.

If the property is disposed of to a non-federal entity, Montgomery County will have control over the ultimate zoning and use of the site by private (including nonprofit) entities, through the county's master planning, zoning, and site plan review process. In addition, both the county's rezoning process and the NCPC review process offer opportunities for public comment. Because of these factors, there is limited potential for land uses that are substantially incompatible with the surrounding area to result. Therefore, no significantly adverse impacts on land use are expected.

### 5.2.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** There will be no direct impacts to land use from Alternative 2. The Army will retain ownership and control of all three parcels until a new owner is found. No changes to existing onpost or surrounding land uses will result from preparing a Report of Excess and interim maintenance activities before transfer or disposal.

**Indirect.** If Parcels 2 and 3 are declared excess along with the NPSHD, the land use on those parcels ultimately will change. The current land use is military medical research on Parcel 2 (a laboratory, Building 189, which ceased operation in 1999 and is scheduled for demolition in the first quarter of FY 2000) and military supply and storage on Parcel 3 (a salt dome and warehouse, which are still in active use). These parcels are currently zoned for residential use (R-90), which will take effect if the parcels leave federal ownership. Redevelopment plans for these parcels will be reviewed by the County or NCPC and are likely to be more compatible with surrounding residential land use than their current military use, which is more like the light industrial land uses along Brookville Road and the CSX railroad.

### 5.2.3 Alternative 3: No-Action

**Direct.** There will be no change in land use from the no-action alternative. The Army will retain ownership and maintain the property indefinitely, in its current underutilized condition.

**Indirect.** Alternative 3 will have an indirect long-term adverse effect on the existing land use of the site. If the property is maintained at the levels associated with its current status (routine maintenance only) for an extended period, the condition of the buildings and infrastructure will inevitably decline, making them unsuitable to support the land uses associated with fully operational conditions. This will not be a significant impact as the Army has determined that the buildings are no longer necessary to meet mission requirements.

The next revision of the Forest Glen Annex Master Plan (planned for FY 2000) will need to address the status of the property and apply more appropriate future land use designations as necessary (i.e., the designation of parts of the NPSHD for Family Housing is no longer appropriate because the buildings are no longer suitable for that use).

#### 5.2.4 Alternative 4: Mothballing

**Direct.** Alternative 4 will require the Army to take steps to secure the buildings and retain the NPSHD indefinitely as a vacant property, until some other decision is reached about their ultimate disposition. No immediate change to existing land use will result.

**Indirect.** Alternative 4 could have an indirect long-term adverse effect on the existing land use of the site. If the property is maintained in mothballing status for an extended period, the condition of the buildings and infrastructure could decline, albeit more gradually than under Alternative 3, eventually making them unsuitable to support the land uses associated with fully operational conditions. This will not be a significant impact as the Army has determined that the buildings are no longer necessary to meet mission requirements.

### 5.3 Air Quality

#### 5.3.1 Alternative 1: Excessing the NPSHD

**Direct.** There will be no direct impacts to air quality. Maintenance of the Power Plant boiler and generator would be continued under this alternative. While GSA is pursuing possible new owners, the Army will continue to own and maintain the property. Ultimately, the alternative may require that all activities cease that are currently performed in all buildings in the parcels to be excessed.

**Indirect.** Excessing the property will allow for its eventual disposal and, ultimately, its reuse by new owners other than the Army. Depending on the type of reuse selected, demolition and construction would result in emission changes. Emissions and fugitive dust from demolition and construction activities would be temporary and could be controlled through the use of approved dust suppression and construction control measures. The existing Power Plant boiler would be taken off line and replaced with new heat sources, which could impact the area's air quality. Any additional emitters, however, must conform to applicable local and state regulations; additionally, new sources would likely be more efficient than the existing boiler.

Reoccupation of the now largely vacant property also will generate some mobile emissions from new vehicular traffic. Vehicular emissions are not expected to be a significant source

for the property, because the property is relatively small and is not likely to attract a large number of employees or residents from outside the region, and also because controlling vehicular traffic is expected to be one of Montgomery County's goals in zoning and approving a new use for the property, if the property goes to a non-federal entity, and is expected to be a focus of comments during NCPC intergovernmental review, if the property is transferred to a federal agency.

### 5.3.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** There will be no direct impacts to air quality.

**Indirect.** Excessing all three parcels will allow for their eventual disposal and, ultimately, reuse by new owners other than the Army. Depending on the type of reuse selected, demolition and construction would result in emission changes. Emissions and fugitive dust from demolition and construction activities would be greater than for Parcel 1 alone, but they would be temporary and could be controlled through the use of approved dust suppression and construction control measures. The existing Power Plant boiler would be taken off line and replaced with new heat sources, which could impact the area's air quality, but would likely be more efficient than the existing boiler on Parcel 1.

### 5.3.3 Alternative 3: No-Action

**Direct.** There would be no direct impacts on air quality caused by the no-action alternative. Under this alternative, the Army will retain ownership and maintain the property indefinitely in its current underutilized status.

**Indirect.** As long as the existing boiler and generators are in use, there also would be no indirect air emission impacts caused by the no-action alternative. Over the long term, the fire station and any other remaining uses on the NPSHD could be moved elsewhere on Forest Glen Annex; the boiler and generators could then be taken off line, which would have a minor beneficial effect on the area's air quality.

### 5.3.4 Alternative 4: Mothballing

**Direct.** This alternative will require the Army to take steps to secure the buildings and retain the NPSHD indefinitely as a vacant property, until some other decision is reached about their ultimate disposition. Mothballing will have no direct impact on air quality, as long as the boiler and generators are still used to maintain the property.

**Indirect.** Indirect air emission impacts caused by Alternative 4 will be similar to those described for the no-action alternative.

### 5.3.5 Clean Air Act Conformity

Section 176(c) of the Clean Air Act requires that no federal agency shall engage in, support, or provide financial assistance for, license or permit, or approve any activity that does not conform to an approved or promulgated state implementation plan (SIP). Conformity to a SIP means conformity to a plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards. It further refers to conducting activities so that

they will not cause or contribute to any new violation of any standard in any area, increase the frequency or severity of any existing violation of any standard in any area, or delay timely attainment of any standard of any required interim emission reductions or other milestones in any area. These foregoing requirements apply regardless of an area's attainment status.

Under CAA regulations at 40 CFR Part 93, Subpart B, conformity determinations must be made for federal actions occurring in nonattainment areas and maintenance areas for NAAQS for SO<sub>2</sub>, CO, ozone, NO<sub>x</sub>, lead, and particulate matter. The proposed action occurs in a nonattainment area for ozone.

Conformity under the Clean Air Act, Section 176, has been evaluated for the proposed federal action of excessing and ultimately disposing of the NPSHD property. The proposed action is described as an exempt action under the General Conformity Rule, subpart 40 CFR 51.853.(c)(xiv):

“Transfers of ownership, interests, and titles in land, facilities, and real and personal properties, regardless of the form or method of the transfer”

and 40 CFR 51.853.(c)(xx):

“Transfers of real property, including land, facilities and related personal property, from a Federal entity to another Federal entity, and assignments of real property, including land, facilities and related personal property, from a Federal entity to another Federal entity, for subsequent deeding to eligible applicants.”

A “Record of Non-Applicability to the General Conformity Rule” is attached in Appendix D.

## 5.4 Noise

### 5.4.1 Alternative 1: Excessing the NPSHD

**Direct.** The excessing alternative will not directly result in any new sources of noise.

**Indirect.** Excessing the property will allow for its disposal and reuse by parties other than the Army. Depending on the type of reuse selected, heavy equipment used for demolition and construction activities could intermittently increase noise levels at the site and could create a temporary nuisance for people living nearby. The resulting short-term impact would cease when redevelopment is complete and is not expected to be significant, because peak noise levels would be required to conform to local allowances for construction activities.

New development that is compatible with the surrounding residential land use is unlikely to result in any new major sources of noise. Some new traffic will be generated at the site after it is reoccupied, which will increase the audible noise at peripheral residences and businesses. This is not expected to be significant in the context of the existing, continuous noise from traffic on the Capital Beltway along the northern boundary of the property, as well as intermittent noise from the CSX rail system along the eastern boundary.

These existing offsite noise sources potentially could be a minor limiting factor for certain types of proposed reuses of the property, but is not expected to discourage most prospective users who are willing to locate in an urban environment.

#### 5.4.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** The excessing alternative will not directly result in any new sources of noise.

**Indirect.** Excessing the property will allow for its disposal and reuse by parties other than the Army. Noise impacts associated with demolition and construction would be similar to Alternative 1, but the level of temporary audible noise at peripheral residences and businesses will be greater if all three parcels are redeveloped at the same time. Little or no difference in the level of noise generated by additional traffic to Parcel 2. Existing intermittent noise from truck traffic at the warehouse (Building 178) on Parcel 3 would be reduced if that parcel is redeveloped for a different use.

#### 5.4.3 Alternative 3: No-Action

**Direct.** The no-action alternative will not directly result in any new sources of noise.

**Indirect.** There also would be no indirect noise impacts under the no-action alternative.

#### 5.4.4 Alternative 4: Mothballing

**Direct.** Alternative 4 could result in some intermittent, temporary noise associated with minor construction projects needed to secure the exteriors of buildings. The Army will minimize noise impacts on sensitive receptors by limiting any noisy activities to daytime hours and, if complaints are received from neighbors, by employing additional noise control measures as necessary.

**Indirect.** No indirect noise impacts are anticipated under Alternative 4.

### 5.5 Water Resources

#### 5.5.1 Surface Water

##### 5.5.1.1 Alternative 1: Excessing the NPSHD

**Direct.** There would be no direct impacts on surface water resources from Alternative 1. Under this alternative, the Army will declare the NPSHD to be an excess property, thereby beginning the disposal process. While GSA is pursuing disposal opportunities, the Army will continue to own and maintain the property. Ultimately, the alternative may require that all activities cease that are currently performed in all buildings in the parcels to be excessed.

**Indirect.** Because the storm drainage system is mostly comprised of 50-year old vitrified clay pipes, modifications to the system will likely be included in any reuse option. At a minimum, removal of silt from and maintenance of grate inlets will be required to prevent additional soil erosion and scour holes.

The new owner of the property will be responsible for obtaining any required permits and for mitigating construction impacts, as required by state and federal laws and regulations.

#### 5.5.1.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** There would be no direct impacts on surface water resources from Alternative 2.

**Indirect.** Storm drainage concerns for the additional parcels are similar to those discussed for the NPSHD. The new owner of the property will be responsible for obtaining any required permits and for mitigating construction impacts, as required by state and federal laws and regulations.

#### 5.5.1.3 Alternative 3: No-Action

**Direct.** In this alternative, the Army would retain ownership and the property would be maintained indefinitely in its current underutilized condition. There would be no direct impacts on surface water resources.

**Indirect.** Currently, excessive quantities of concentrated runoff bypass the storm drain system. As a result, soil has eroded, and scour or sump holes or both have formed, which are compromising structures. Problems are occurring adjacent to both building foundations and roads (Higginbotham/Briggs & Associates, 1997). If this situation is not corrected, there will be additional deterioration of structures as well as additional site erosion affecting water quality in the streams on and near the property.

#### 5.5.1.4 Alternative 4: Mothballing

**Direct.** In this alternative, the Army would retain ownership and the property would be maintained indefinitely as vacant buildings, after taking specified steps to secure the buildings. Alternative 4 would not have a direct impact on surface water resources.

**Indirect.** Indirect impacts on water resources by this alternative would be similar to the no-action alternative impacts.

### 5.5.2 Groundwater

#### 5.5.2.1 Alternative 1: Excessing the NPSHD

**Direct.** Under this alternative, there are no direct impacts on the groundwater.

**Indirect.** There may be some indirect impacts of this alternative on groundwater. Ultimately, all Army activities using hazardous and toxic materials will cease, leading to a potential benefit for groundwater by removing a possible source of future contamination. This may be offset by later use of the property by other parties, but new uses compatible with the surrounding residential land use are not likely to use, store, or generate large quantities of hazardous materials. Groundwater quantity will not be affected.

#### 5.5.2.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** Under this alternative, there are no direct impacts on groundwater.



**Indirect.** If the decision is made to remove the UST, which was installed by the Army in 1997 at Building 178 on the optional railroad parcel, and if groundwater contamination is detected, a remediation system may be needed. However, no such groundwater contamination is expected at this time, on the basis of available information.

The new owner will be notified of the presence of this UST in the property transfer documentation. Unless the new owner agrees to accept responsibility for any contamination related to this UST that is discovered in the future, if a remediation system were needed, then its installation and maintenance would be the responsibility of the federal government until remediation is completed or determined to no longer be necessary. (See subsection 5.9 "Hazardous and Toxic Materials" for a more detailed discussion.) Groundwater quality would be improved over time as remediation proceeded. Access would be required to the system during the period of operation. Any such groundwater contamination also could affect certain activities where human health may be at risk, such as excavating basements or other structures and coming in contact with contaminated groundwater, and measures would need to be taken to limit this risk.

#### 5.5.2.3 Alternative 3: No-Action

**Direct.** The no-action alternative will have no direct impacts on groundwater by.

**Indirect.** There also would be no indirect impacts on groundwater under Alternative 3. There are no groundwater remediation systems currently operating on the property and the assumption is that the mission of the buildings will continue the same or will cease over the long term.

#### 5.5.2.4 Alternative 4: Mothballing

**Direct.** The direct impact of Alternative 4 would be that all activities that are currently performed in all buildings to be mothballed would cease. However, this has no direct impact on groundwater.

**Indirect.** There could be an indirect beneficial impact on groundwater quality under this alternative, in that any risks of contamination from current activities in the mothballed buildings would be eliminated. There is no impact on groundwater quantity.

## 5.6 Geology

### 5.6.1 Alternative 1: Excessing the NPSHD

**Direct.** Under this alternative, there are no direct impacts on the geology, soil, and topography.

**Indirect.** There may be some indirect impacts on soil under Alternative 1. The reuse option selected may lead to increased erosion from construction. However, this can be controlled by proper engineering and by complying with state and local regulations.

### 5.6.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** Under this alternative, there are no direct impacts on the geology, soil, and topography.

**Indirect.** There may be some indirect impacts on soil under Alternative 2. The reuse option selected may lead to increased erosion from construction, which could be greater from redeveloping up to 10 additional acres. However, this impact can be controlled by proper engineering and by complying with state and local regulations.

### 5.6.3 Alternative 3: No-Action

**Direct.** There would be no direct impacts on geology, soil, and topography under the no-action alternative.

**Indirect.** Alternative 3 may result in long-term adverse impacts on soil, because excessive quantities of concentrated runoff currently bypass the storm drain system, causing ongoing erosion. If this situation is not corrected, there will be additional site erosion. The assumption is that no grading or other activity that may otherwise affect soil will occur.

### 5.6.4 Alternative 4: Mothballing

**Direct.** There will be no direct impact on geology, soil, and topography under Alternative 4.

**Indirect.** There is an indirect beneficial impact on soil under Alternative 4, in that the risks of contamination by facility activities are eliminated. There also may be an impact on soil if excavations are performed to mothball subsurface utilities. Ongoing adverse impacts to soil from erosion will continue, unless mothballing includes measures (at a minimum, removal of silt from grate inlets and maintenance of inlets) to correct existing stormwater problems on the site.

## 5.7 Infrastructure

### 5.7.1 Alternative 1: Excessing the NPSHD

**Direct.** Under this alternative, there are no direct impacts on infrastructure caused by reporting the NPSHD as an excess property.

**Indirect.** Excessing the property will allow for its eventual disposal and, ultimately, its reuse by new owners other than the Army. Many of the infrastructure systems at the facility are 30 to 50 years old. Upgrading or replacing these systems, or both, will be required to allow long-term reuse. The level of upgrade will be dependent on the selected uses. In particular, the boiler at Building 120 and portions of the electrical distribution system and storm drain system may require upgrading. Upgrading or replacement would improve the efficiency of these systems. Sufficient capacity exists in local services to accommodate reuse of the NPSHD.

### 5.7.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** Under Alternative 2, there are no adverse direct impacts on infrastructure caused by reporting the NPSHD and the additional parcels as an excess property. Infrastructure serving the Linden Lane parcel and the railroad parcel, including the sanitary sewer system and the distribution systems for steam, electricity and water are directly connected to the NPSHD. The branches of these systems that serve the NPSHD terminate in the Linden Lane and railroad parcels. Therefore, in terms of the infrastructure systems, excessing these additional parcels along with the NPSHD is preferred over excessing the NPSHD by itself.

**Indirect.** Excessing the NPSHD and additional parcels will allow for their eventual disposal and, ultimately, reuse by new owners other than the Army. As discussed for Alternative 1, portions of the electrical distribution system and storm drain system may require upgrading. Upgrading or replacement would improve the efficiency of these systems. Sufficient capacity exists in local services to accommodate reuse of the NPSHD.

Excessing Parcel 3 could indirectly result in adverse impacts on WRAMC infrastructure when it is transferred to a new owner, because two facilities located on Parcel 3 are still for WRAMC operations: the salt dome (Building 179) and the warehouse (Building 178). Disposal of these parcels will make these facilities unavailable for Army use.

The Salt Dome could be moved to another location at Forest Glen, or a cooperative agreement to use the nearby WSSC salt dome on Brookville Road could be negotiated. The warehouse cannot be replaced with an offpost leased facility, because it is WRAMC's only warehouse and WRAMC operations require access at all hours. WRAMC has programmed a new warehouse for FY 2002. If the Parcel 3 is transferred to a new owner before the new warehouse is available, the existing building could be leased back from the new owner for a limited time.

The EA for the 1992 Master Plan evaluated the impacts of constructing a new warehouse in the southwestern portion of Forest Glen (RGH, 1990). If Alternative 2 is selected, additional NEPA documentation will be completed, to further evaluate the alternatives and impacts of constructing a new warehouse and relocating the salt dome.

### 5.7.3 Alternative 3: No-Action

**Direct.** The no-action alternative would continue indefinitely the current low level of Army use of the NPSHD property, which will have no direct impact on the infrastructure system or its suppliers.

**Indirect.** There would also be no indirect impacts on the infrastructure system or its suppliers.

### 5.7.4 Alternative 4: Mothballing

**Direct.** In this alternative, the Army would retain ownership and the property would be maintained indefinitely as vacant buildings. There will be no direct impact on the infrastructure with this alternative.

*Indirect.* There would also be little or no indirect impacts on the infrastructure system or its suppliers.

## 5.8 Transportation

### 5.8.1 Alternative 1: Excessing the NPSHD

*Direct.* The Army's proposed action of declaring the NPSHD excess is an administrative action that will have no direct impact on the transportation system in the Silver Spring area of Montgomery County.

*Indirect.* Excessing the property will allow for its disposal to a new owner and its eventual reuse. Currently the buildings on the property are unoccupied; vehicular traffic to and from the site is mostly limited to the fire station, power plant, and homeless shelter. It is likely that any type of reuse of this property will result in an increase in vehicular traffic over what exists today. The magnitude and impact of additional traffic depends directly on the type of reuse development planned for this property. A low-density residential use would likely result in a lesser traffic impact than a high-density retail or commercial use.

Without a definable reuse scenario, it is not possible to quantify the traffic impacts associated with reuse of the NPSHD and optional parcels. When a specific reuse scenario, or scenarios are defined, a complete traffic/transportation study will be necessary to quantify and qualify potential impacts to the surrounding system. Such a study should address issues such as:

- The operational and safety affects of additional peak hour traffic added to the surrounding roadway system, including the intersections described in this document.
- Pedestrian activity
- Location of access points to/from the site on Linden Lane.
- Coordination with local transit services
- Parking requirements
- Operational and safety improvements necessary on Linden Lane between Steven Sitter Avenue and New Castle Avenue.
- The potential for additional “cut-through” traffic on streets in the Forest Glen Park and Linden neighborhoods, such as New Castle Avenue, Forsythe Avenue, and Linden Lane.
- Considering cumulative impacts with the new WRAIR facility that is planned to open in 2000.

Figure 4-6 shows the existing baseline peak-hour conditions. Traffic impacts associated with a proposed land use can be compared and evaluated relative to these baseline traffic volumes.

Recently, the WRAMC Public Works Department completed a study of the roadway system serving land uses in the vicinity of the WRAIR Facility. The proposed improvements to the Steven Sitter Avenue and Brookville Road will improve traffic operations and access on the south side of the post. These transportation improvements include installing a right-turn lane from Brookville Road to Steven Sitter Avenue and installing a right-turn lane from Steven Sitter Avenue to Brookville Road. These improvements should be considered in future traffic and transportation studies addressing the reuse of the NPSHD.

If the property is disposed of to a non-federal entity, Montgomery County will have the opportunity to control traffic impacts through the rezoning process and through the county's Annual Growth Policy, which prevents approval of development in areas where the capacity of public facilities is nearing its ceiling. If the property is transferred to a federal agency, the County will have the opportunity to influence traffic impacts by offering comments during the NCPC intergovernmental review process. Therefore, significantly adverse impacts on transportation system facilities are not anticipated.

### 5.8.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** Declaring the NPSHD and additional parcels to be excess is an administrative action that will have no direct impact on the transportation system in the Silver Spring area of Montgomery County.

**Indirect.** Excessing these parcels will allow for their disposal to a new owner and eventual reuse. If the two additional parcels are excessed along with the NPSHD, that will make more land available for development than the NPSHD parcel alone, which could increase traffic impacts somewhat in comparison to Alternative 1. However, the additional parcels could also make additional land available for transportation improvements. Ceasing operations at the existing WRAMC warehouse on Parcel 3, if that the new owner chooses to use that parcel for another purpose, could reduce the existing truck traffic on Linden Lane.

### 5.8.3 Alternative 3: No-Action

**Direct.** The no-action alternative would continue indefinitely the current low level of Army use of the NPSHD property, which will have no direct impact on the transportation system in Silver Spring area of Montgomery County.

**Indirect.** The no-action alternative would continue indefinitely the current low level of Army use of the NPSHD property, which will have no indirect impact on the transportation system in Silver Spring area of Montgomery County.

### 5.8.4 Alternative 4: Mothballing

**Direct.** Alternative 4 would continue the current low level of Army use of the NPSHD property, until issues related to the future of the property can be resolved. Mothballing will have no direct impact on the transportation system in the Silver Spring area of Montgomery County.

*Indirect.* Alternative 4 would continue indefinitely the current low level of Army use of the NPSHD property, which will have no indirect impact on the transportation system in Silver Spring area of Montgomery County.

## 5.9 Hazardous and Toxic Materials

### 5.9.1 Alternative 1: Excessing the NPSHD

Alternative 1 would begin the GSA screening and disposal process for the NPSHD.

*Direct.* Reporting the NPSHD to GSA as excess property will not result in any direct impacts related to hazardous, toxic, and radiological materials on the property. The Army will not increase activities associated with these materials and will, in fact, continue to reduce activities and begin cleaning up where such materials have been used or stored.

*Indirect.* There will be some indirect impacts under Alternative 1. Hazardous substances stored in buildings in which they were used will be removed from the buildings and disposed of properly, and the storage and usage areas will be thoroughly cleaned.

While GSA is pursuing possible disposal opportunities, the Army will continue to control and maintain the property and will continue with any ongoing investigation or remediation of hazardous materials contamination. Ultimately, Alternative 1 will require that all Army and tenant activities cease that are currently performed in all buildings in the NPSHD.

Ultimately, there should be few, if any, restrictions on the future use of these buildings because of past storage or releases of hazardous materials. Deed notices and restrictions will be used to disclose the specific nature of any remaining hazards to the new owners. Any remediation systems established and operated by the Army would continue to be maintained by the Army until the remediation is completed or is determined to no longer be necessary. However, on the basis of available information, no such remediation systems are anticipated at this time. It will be the responsibility of GSA to identify disposal reuse options that are compatible with any ongoing remediation.

#### 5.9.1.1 Regulatory Considerations for Property Transfer

The GSA screening and disposal process differs somewhat from the BRAC disposal process, developed over the last decade, with which many people are more familiar. According to section 15-6, "Real Property Acquisition, Outgrant and Disposal Transactions" of DA PAM 200-1 (October 1998):

"Reporting a property to GSA for screening and disposal is not a transfer of jurisdiction to another federal agency and therefore does not require an Environmental Condition of Property (ECOP). In addition, the final screening results and disposal methods are not completed [at this stage], so a Finding of Suitability to Transfer (FOST) is not required. However, an EBS is required for property going to GSA for disposal and the EBS shall become part of the Report of Excess."

Because of the time elapsed since the 1996 EBS for the NPSHD was prepared, the EBS is no longer contains the most current information; therefore, to comply with DA PAM 200-1,

both the EBS and this EA should be considered together in "determining the proper notification and remediation, if required, to effect the proposed transfer" of the NPSHD and optional parcels to a new owner. Both the 1996 EBS and this EA will be attached to the Report of Excess that will be sent to GSA.

Under AR 405-90, *Disposal of Real Estate*, and the more recent guidance provided by DA PAM 200-1, the Army is required to identify and evaluate suspected problems caused by previous activities in which hazardous materials were used, control the migration of hazardous materials from such facilities, and control hazards to health or welfare that may have resulted from the activities. The Army may decontaminate to a level of restricted use or may decontaminate to a more stringent level for unrestricted use, when technically and economically feasible and when the recipient will accept the property only in an unrestricted use condition.

On the other hand, the Army may arrange to release the property without decontamination, particularly for buildings that the new owner will demolish or will use for similar activities. In this case, the new owner will be responsible for adequate decontamination to protect public health and the environment and will indemnify the federal government and hold it harmless against claims. In the event that the responsibility for decontamination is transferred to the new owner, the Army will provide the new owner with all information available on hazardous material usage and occurrence in the buildings.

In all cases, the Army will conduct actions to a level necessary to protect human health and the environment. The Army Environmental Center (AEC) will review disposal plans and the completed program for adequacy of decontamination.

These requirements generally are consistent with those of CERCLA. For property that the federal government transfers by deed, CERCLA section 120(h) requires that the deed contain a covenant guaranteeing that all remedial action necessary to protect human health and the environment from hazardous substances remaining on the property will be taken before the date of transfer. Also, any additional remedial action found to be necessary after the date of transfer will be conducted by the federal government. For purposes of the CERCLA 120(h) covenant, all necessary remedial action will have been taken if an approved remedial design has been constructed and installed and the remedy has been demonstrated, to appropriate regulatory agencies, to be operating properly and successfully. However, on the basis of available information, no such remedial action is anticipated to be necessary for the NPSHD at this time.

Transferring property with deed restrictions may be feasible for sites where proposed uses are the same as, or are compatible with, existing conditions and uses, and with remedial actions. In such a case, deed restrictions might require that the new owner:

- Commit to performing all environmental restoration, waste management, and environmental compliance required under federal or state laws;
- Commit to all requirements and responsibilities associated with any remaining hazardous substances or conditions; or

- Permit the federal government access for continued remediation or long-term monitoring.

#### **5.9.1.2 Hazardous Materials Storage and Handling Areas**

As described in subsection 4.9, “Hazardous and Toxic Materials”, there are several locations within the NPSHD and the additional parcels where hazardous and toxic materials have been stored or used; these are Buildings 120, 188, and 149A in the NPSHD. Several ASTs are located on the NPSHD (Building 120).

Although there have been spills of hazardous and toxic materials at several locations in the NPSHD, the spills were cleaned up promptly and no adverse effects were noted. Results of sampling in the stained soil and floor areas at Building 120, along with preliminary recommendations (if any) for additional investigation or remediation, will be available before the Report of Excess is delivered to GSA.

If the non-historic laboratory buildings (185 to 188) in the NPSHD are planned for demolition by the new owner, the interiors of the buildings may need to be sampled for residual contamination. Appropriate remedial measures, if needed, should be implemented to deal with any residual contamination.

Improper use of hazardous materials by the new owners in their normal course of operations could result in new contamination. However, if the new owners observe state and federal regulations governing the use of hazardous materials, they will minimize the possibility of renewed contamination. New development that is compatible with the surround residential land use is unlikely to use, store, or generate large quantities of hazardous materials. No significantly adverse impacts are expected because hazardous materials are regulated.

#### **5.9.1.3 Radon**

Excessing the NPSHD will have no immediate effect on radon in buildings. Current DOD policy is to ensure that available radon assessment data is included in property transfer documents, but not to perform radon assessment or mitigation prior to transfer, unless otherwise required by law (Vest, 1994). All available information on radon conditions in NPSHD Building 126 (and other buildings where radon was not detected above the action level) will be disclosed in the documents that transfer the property from the Army to the new owner. The Army will continue operating the systems for temporarily mitigating radon in affected buildings until the property is ready to be transferred to a new owner. At that time, the Army will remove the existing ventilation systems and the responsibility for installing new ventilation systems, or taking other actions to reduce radon to safe levels, will become the responsibility of the new owner (Porter, personal communication 1999). Likewise, the new owner will be responsible for addressing potential radon hazards in any new or renovated buildings.

This situation differs from other types of remediation systems operated by the Army before property transfer, in that the problem did not originate in the use of any hazardous materials by Army activities, but rather is a result of natural underlying geologic conditions. It should be noted that, in the case of the ventilation systems being used to reduce elevated



levels of radon, it is unlikely that such “remediation” would ever be completed because the source of the contamination, the underlying bedrock, is an almost limitless source of radon.

#### 5.9.1.4 Asbestos

Excessing the NPSHD also would have no immediate effect on the ACM, which was found in nearly all of the buildings in the NPSHD. DOD policy states that, unless ACM poses a threat to human health at the time of transfer, property containing ACM will be conveyed “as is” (Vest, 1994). The Army will be responsible for removing, sealing, or otherwise rendering safe any ACM that poses a threat to human health at the time of transfer, unless an agreement is reached that the transferee will take responsibility for such action, or unless the structure is to be demolished or renovated in compliance with applicable regulations. Information about the presence and condition of ACM will be provided to the transferee of the property at the time of transfer.

Demolition or renovation of buildings can disturb and potentially release ACM. Before the new owners can begin any demolition, asbestos must be removed by a qualified, licensed contractor, under applicable state and federal regulations. Before the new owners can renovate, they must determine if the ACM will be disturbed or affected by the renovations and then must take appropriate actions to protect human health and the environment under appropriate state and federal regulations.

#### 5.9.1.5 Lead-Based Paint

Similar requirements apply to lead-based paint. For housing constructed before 1960 (as most of the Historic District was), any hazards associated with lead-based paint must be abated by the federal government before transfer for future housing use, unless the structure is scheduled for non-residential use or demolition, or unless an agreement is reached that the new owner will take responsibility for such action and will renovate the structure in compliance with applicable regulations (Vest, 1994).

Demolition or renovation of buildings can disturb and potentially release lead-based paint as dust or debris. The new owners will be responsible for taking appropriate actions to protect human health and the environment under appropriate state and federal regulations, including the proper disposal of construction or demolition debris containing lead-based paint.

#### 5.9.1.6 Radiological Materials

The two buildings in the NPSHD (149-A and 188) that were formerly used to receive, test and temporarily store packages containing radiological materials have been surveyed and found to be free of residual radiological contamination.

### 5.9.2 Alternative 2: Excessing the NPSHD with Additional Parcels

*Direct.* Alternative 2 would begin the GSA screening and disposal process for the NPSHD and the additional parcels. Reporting the parcels to GSA as excess property will not result in any direct impacts related to hazardous, toxic, and radiological materials on the property. The Army will not increase activities associated with these materials and will, in fact,

continue to reduce activities and begin cleaning up where such materials have been used or stored.

**Indirect.** The indirect impacts and regulatory considerations for hazardous and toxic materials, radon, asbestos and lead-based paint are essentially the same under Alternative 2 as discussed under Alternative 1.

As described in subsection 4.9, “Hazardous and Toxic Materials”, there are several locations within the additional parcels where hazardous and toxic materials have been stored or used; these are Building 189 in Parcel 2 and Building 178 in Parcel 3. The additional parcels contain one UST (Building 178 in Parcel 3). Although there have been three reported spills of hazardous and toxic materials at Building 178 (Parcel 3), the spills were cleaned up promptly and no adverse effects were noted.

Building 189 on Parcel 2 is scheduled for demolition by the Army in the first quarter of FY 2000. The current plan is to level the building and leave the foundation. The interior of the building will be sampled for residual contamination before the building is demolished.

There is a possibility that remediation may be required if the UST installed in 1997 at Building 178 on Parcel 3 is removed and if contamination of soil or groundwater or both is detected; however, no such contamination is expected on the basis of currently available information.

All available information on lead-based paint and ACM in buildings on the NPSHD and additional parcels, as well as radon conditions in Building 135 (and other buildings where radon was not detected above the action level), will be disclosed in the documents that transfer the property from the Army to the new owner.

### **5.9.3 Alternative 3: No-Action**

In this alternative, the Army would retain ownership and the property would be maintained indefinitely in its current underutilized condition.

**Direct.** There would be no direct impacts of the no-action alternative. The assumption is that the current use of all buildings would not change.

**Indirect.** There also would be no indirect impacts of the no-action alternative. The Army would continue to maintain existing radon-remediation systems until it is determined that they are no longer necessary.

Alternative 3 for the NPSHD does not preclude the already-programmed demolition of Building 189 on Parcel 2 and perhaps the other nonhistoric laboratory buildings in the NPSHD. In this case, sampling the interiors for residual contamination and appropriate disposal of the debris will be undertaken as part of the demolition action.

### **5.9.4 Alternative 4: Mothballing**

In this alternative, the Army would retain ownership and the property would be maintained indefinitely as vacant buildings.

**Direct.** The direct impact of Alternative 4 would be that activities that are currently performed in all buildings to be mothballed would cease. All remaining hazardous, toxic, and radiological materials would be removed and properly disposed of, and the usage and storage areas thoroughly cleaned.

**Indirect.** There is a potential for radon to accumulate in any buildings that are sealed to prevent further deterioration. The assumption, however, is that the radon levels would return to current safe levels once the sealing is removed. Also, the sealed areas may be provided with sufficient ventilation (to control moisture) that also could prevent further radon buildup. The Army would continue to maintain existing remediation systems until it is determined to no longer be necessary.

Alternative 4 does not preclude the demolition of Building 189 on Parcel 2 and perhaps other buildings in the NPSHD. In this case, sampling for residual contamination and appropriate disposal of the debris will be undertaken as part of the demolition action.

## 5.10 Biological Resources

### 5.10.1 Alternative 1: Excessing the NPSHD

**Direct.** Under Alternative 1, no direct impacts to biological resources in the NPSHD are expected because excessing is an administrative action and will not change the current use of the property.

**Indirect.** Under Alternative 1, indirect adverse impacts to the surrounding biological resources are possible, but are not expected to be significant. Possible outcomes of declaring the property in excess are transfer or disposal of the NPSHD to a new owner, who will conduct demolition of at least some non-historic buildings and subsequent redevelopment of some kind. Resultant impacts to biological resources could include loss of forested habitats or erosion and sedimentation of aquatic environments in the onsite tributary to Rock Creek.

To the extent that the historic district is protected through restrictive covenants, those restrictions also will likely limit the extent of new construction and the resultant impacts to biological resources. Because of these restrictions and the development constraints posed by steep slopes in the Glen, disruption of the wildlife corridor between Rock Creek Regional Park to the north of the NPSHD and Rock Creek National Park to the south is not expected.

The new owner of the property will be responsible for obtaining any required construction permits and mitigating construction impacts, as required by state and federal laws and regulations.

If the NPSHD is transferred or disposed of and is subsequently redeveloped, the MDNR recommends developing only non-forested areas, minimizing the number, length, and width of roads, creating wildlife corridors, and avoiding disturbance of forested habitats during the breeding season (May to August) for Forest Interior Dwelling (Bird) Species (FIDS). This season may be extended to February through August to protect early nesting FIDS such as the barred owl (MDNR, 1997).

During construction, use of sedimentation ponds and barriers should be used to prevent erosion on slopes and sedimentation of nearby streams. Erosion and sedimentation could cause adverse effects to the vegetative communities on the slopes and the aquatic fauna and flora in the riparian habitats. No rare, threatened, or endangered species are known to exist on this property.

Impacts to waters of the U.S. and forested areas over 40,000 square feet require federal and state permits. Streams identified as waters of the U.S. are protected by federal and state regulations. Potential impacts from development activities require a permit based on area and type of impact.

Federal regulations require that any development that may impact waters of the U.S. must be authorized by the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers under Section 404 of the Clean Water Act. In addition, Section 10 of the 1899 Rivers and Harbors Act prohibits obstructing, excavating, filling, or otherwise altering navigable waters of the U.S. unless authorized by the U.S. Army Corps of Engineers. Maryland state regulations require that a Nontidal Wetlands and Waterways Permit be filed to prevent any loss or degradation of Maryland's waterways.

Forested areas within the state of Maryland are protected by the Forest Conservation Act. The Forest Conservation Act was enacted to protect the forests of Maryland, which greatly contribute to the quality of life in Maryland and the health of its natural ecosystems. Under this program, developments affecting over 40,000 square feet must complete a forest stand delineation. Based on the extent of impacts (if any) to forests on the development site, a forest conservation plan is then prepared to determine the magnitude of effects and the amount of reforestation required to mitigate impacts.

### **5.10.2 Alternative 2: Excessing the NPSHD with Additional Parcels**

**Direct.** Under Alternative 2, no direct impacts to biological resources in the NPSHD or the additional parcels are expected because excessing is an administrative action and will not change the current use of the property.

**Indirect.** Under Alternative 2, indirect adverse impacts to the surrounding biological resources are possible, but are not expected to be significant. Possible outcomes of declaring the property in excess are transfer or disposal of the parcels to a new owner, who will conduct demolition of at least some non-historic buildings and subsequent redevelopment of some kind. Resultant impacts to biological resources could include loss of forested habitats or erosion leading to sedimentation of aquatic environments in the tributary streams to Rock Creek.

Excessing the additional parcels along with the NPSHD will increase the amount of developable land by up to 10 acres and could increase the magnitude of construction-related impacts such as erosion and sedimentation. Because of the anticipated restrictions on development in the historic district and the development constraints posed by steep slopes in the Glen, disruption of the wildlife corridor between Rock Creek Regional Park to the north of the NPSHD and Rock Creek National Park to the south is not expected.

As discussed under Alternative 1, the new owner of the property will be responsible for obtaining any required construction permits and mitigating construction impacts, as required by state and federal laws and regulations.

### 5.10.3 Alternative 3: No-Action

**Direct.** The no-action alternative will not result in any direct impacts to the biological resources within the NPSHD or the additional parcels.

**Indirect.** The no-action alternative will not result in any indirect impacts to the biological resources of the NPSHD or additional parcels.

The demolition of building 189 (Parcel 2) is planned for the first quarter of FY 2000, as part of the ongoing WRAIR construction project. In addition, Buildings 185, 186, 187, and 188 in the NPSHD are currently listed for future demolition under WRAMC's Facility Reduction Program, if the Army retains the NPSHD. These five nonhistoric buildings could be demolished regardless of the choice of alternatives described in this EA.

Demolishing these buildings could potentially cause adverse impacts to the aquatic resources onsite. The buildings are located on a ridge between two tributaries to Rock Creek; therefore, during demolition, stormwater runoff could convey sediment from exposed soils to the streams draining the area. To avoid and minimize the potential impacts to aquatic resources from sedimentation, proper erosion and sediment control measures will be implemented during demolition activities.

### 5.10.4 Alternative 4: Mothballing

**Direct.** Alternative 4 would continue the current low-level Army use of the NPSHD property, until issues related to the future of the property can be resolved. Mothballing will have no direct impact on the biological resources on the property.

**Indirect.** Alternative 4 will have no indirect impacts on the biological resources located on the property, other than those associated with the possible demolition of the five buildings discussed under Alternative 3.

## 5.11 Cultural Resources

### 5.11.1 Alternative 1: Excessing the NPSHD

**Direct.** The Army's proposed action of reporting the NPSHD as excess is an administrative action that will have no direct impact on the current conditions of the historic properties of the site. The Army will continue to provide current levels of security and maintenance to the structures of the NPSHD until a new owner is found.

Consultation under Section 106 of the NHPA is ongoing. WRAMC initiated Section 106 consultation, in a letter to the Maryland Historical Trust dated June 11, 1999 (Appendix C). In that letter, WRAMC suggested a finding of No Adverse Effect from excessing the NPSHD and proposed entering into a No Adverse Effect MOA with the SHPO for the excessing

action. The letter stated that GSA would coordinate with the SHPO regarding deed restrictions and covenants once GSA's screening and disposal process begins.

In a response dated July 16, 1999 (Appendix C), the Maryland Historical Trust stated that not enough details are available about the future of the NPSHD to determine the effects of excessing. Instead of looking at excessing and transfer/disposal as separate undertakings by the Army and GSA, and entering into separate MOAs, the SHPO has suggested working with the Army, GSA and the Advisory Council to develop a single agreement that would address the entire process, from excessing and interim maintenance (Army actions), to transfer or disposal and negotiation of historic preservation easements (GSA actions).

Although this EA will be finalized before the Section 106 consultation process is completed, the NPSHD will not be transferred to another federal entity, or disposed of to a non-federal entity, until NHPA Section 106 consultation has been completed.

*Indirect.* The anticipated outcome of reporting the NPSHD to GSA as an excess property is either the transfer of the property to another federal agency, or disposal of the property to a non-federal owner. Regulations implementing the NHPA define transfer or lease of historic properties as an adverse effect when the property leaves federal control. (Reporting the property as excess to GSA is not a property transfer, because the Army retains control of the property.)

With GSA acting, in effect, as the Army's real-estate broker, the proposed action of declaring the NPSHD excess will initiate a process for evaluating the cultural resource value of the NPSHD property in the broader atmosphere of potential public needs and private asset markets.

As the disposal agency, the GSA is responsible for marketing the property with a defined level of protective covenants and deed restrictions. For transfer to other federal agencies, controls on reuse of historic properties are already established by federal regulations.

For disposal to non-federal entities, before the property leaves federal ownership, GSA will work to achieve an agreement establishing future covenants and deed restrictions with the appropriate authorities (potentially the Army, Maryland SHPO, and ACHP). Any other non-signatory consulting parties (such as the Montgomery County Historical Commission, SOS, and neighborhood group representatives) that are identified by GSA during its Section 106 consultation process will participate in this process.

Protective covenants will be designed to preserve and enhance those qualities that resulted in the inclusion of the properties in the NRHP. Once covenants are agreed upon by GSA, the SHPO, the Army and ACHP, they will become part of the property transfer documents (see Appendix A: letter dated August 24, 1999, from GSA to the Corps of Engineers). The covenants and deed restrictions will provide the baseline standards of historic preservation for incorporating the cultural values of the property within the broader context of the property's marketability.

Because the Army wishes to dispose of the NPSHD property, and GSA can perceivably return the NPSHD property to the Army if there are no public or private parties interested in acquiring it with the negotiated deed restrictions, there is a great potential that disposal of

the property may eventually revolve around a negotiated standard of cultural resource values.

Complete preservation of all historic properties may not be possible if a successful disposal is to be achieved. Judgments may be required to be made on the relative worth or hierarchical significance of various portions of the property. Some of the historic properties will most likely be demolished or substantially altered, in order to retain and restore others. (For example, the 1996 Facility Use Study concluded that it would be difficult and very expensive to meet building codes and alleviate life safety concerns without demolishing at least some of the NPSHD buildings, including some portions of Building 101.)

Therefore, an adverse effect on some individual historic properties will almost certainly occur. Adverse effects can be mitigated to a nonsignificant level by recordation under the procedures of HABS/HAER or other applicable treatment under the terms of the agreement to be negotiated by GSA. Preservation and adaptive reuse, under the guidance of covenants negotiated through the Section 106 consultation process, will result in a beneficial effect on other historic properties.

The level of adverse effects will depend in part on how many historic properties, and which specific properties, will be affected and on the value placed by the community on some of the individual buildings. Further evaluation of impacts will be provided in the NEPA documentation that will be prepared by GSA for their action of disposal.

In the short term, the condition of the historic buildings will depend on the length of time required to complete the entire screening and disposal process, during which only routine maintenance will take place. A long, drawn-out process could result in more adverse effects on these aging buildings (see the discussion of impacts under Alternative 3, following) before adaptive reuse can begin.

In the long term, the fate of the historic properties in the NPSHD will be determined by the entities making the judgment on what cultural properties to retain and what cultural properties must be mitigated for property disposal, and by the standards on which the judgment is evaluated.

### **5.11.2 Alternative 2: Excessing the NPSHD with Additional Parcels**

**Direct.** The Army's preferred alternative of reporting the NPSHD and two additional parcels as excess is an administrative action that will have no direct impact on the current conditions of the historic properties of the site. The Army will continue to provide current levels of security and maintenance to the structures of the NPSHD until a new owner is found.

Consultation under Section 106 of the NHPA is ongoing for the NPSHD. To date, the additional parcels have not been formally added to the area of potential effect but will be included in any agreement that is negotiated under Section 106 by GSA, the Army, the SHPO and ACHP. Three additional historic buildings, related to the NPSHD, are located on the two additional parcels.

Although this EA will be finalized before the Section 106 consultation process is completed, the NPSHD and additional parcels will not be transferred to another federal entity, or disposed of to a non-federal entity, until NHPA Section 106 consultation has been completed.

*Indirect.* As discussed under Alternative 1, the anticipated outcome of reporting the NPSHD and additional parcels to GSA as an excess property is either the transfer of the property to another federal agency, or disposal of the property to a non-federal owner. Regulations implementing the NHPA define transfer or lease of historic properties as an adverse effect when the property leaves federal control. The GSA (as the disposal agency for federal property) is responsible for marketing the property with a defined level of protective covenants and deed restrictions. For transfer to other federal agencies, controls on reuse of historic properties are already established by federal regulations.

Judgments may be required to be made on the relative worth or hierarchical significance of various portions of the property. Some of the historic properties will most likely be demolished or substantially altered, in order to retain and restore others.

Therefore, an adverse effect on some individual historic properties will almost certainly occur. Adverse effects can be mitigated to a nonsignificant level by recordation under the procedures of HABS/HAER or other applicable treatment under the terms of the agreement to be negotiated by GSA. Preservation and adaptive reuse, under the guidance of covenants negotiated through the Section 106 consultation process, will result in a beneficial effect on other historic properties. Further evaluation of impacts will be provided in the NEPA documentation that will be prepared by GSA for their action of disposal.

The three historic houses (Buildings 135 and 139 on Parcel 2 and Building 136 on Parcel 3) on the additional parcels are likely to be among those that would be demolished and mitigated by a new owner. Building 139 on Parcel 2 is condemned due to structural damage from a fallen tree.

Excessing the NPSHD along with one or both of the two additional parcels would add value to the real property transaction for potential new owner(s), by providing more developable land with fewer of the costs associated with renovating historic buildings. (Building 189 on Parcel 2 is a non-historic laboratory that is scheduled for demolition in the first quarter of FY 2000. Building 178 on Parcel 3 is a non-historic warehouse; Building 178 (Salt Dome) will likely be relocated to another site on Forest Glen Annex.) The additional parcels would make the NPSHD easier to market and could increase the chances of finding a new owner and achieving an economically viable, adaptive reuse for the historic district.

### 5.11.3 Alternative 3: No-Action

*Direct.* The no-action alternative would continue the low level of maintenance and use by the Army. It would have no immediate impact on the current conditions of the historic properties.

*Indirect.* The no-action alternative has the potential for substantial loss of historic properties over the long term. While the Army would be responsible for continued limited



maintenance on the buildings, two issues arise that will result in a prolonged process of losing the historic properties on the site.

The first issue involves building material conservation. Building material conservation requires prudent and judicious investment. Early intervention to correct building system problems and preventive maintenance is important. There is, though, a “point-of-no-return” where a structure reaches a condition requiring major intervention and substantial funds, to bring it back to a state where conservation can be sustained. Even with the Army’s current allocation, many of the structures of the NPSHD appear beyond a sustainable level of conservation.

The second issue is that the preceding litigation (*National Trust on Historic Preservation et al. v. Major General Ronald L. Blanck et al.*), while acknowledging past neglect of historic properties in the NPSHD, nevertheless found no basis in law to require the Army to invest additional funding in order to provide higher standards of property maintenance. Barring the Court’s review of that finding in the ongoing appeal, the no-action alternative will result in continued deterioration of the historic properties, eventually reaching a point where retaining the buildings is not feasible within a building material conservation program. In the long term, without HABS/HAER recordation or other forms of mitigation, this alternative would eventually lead to a significantly adverse impact on historic properties. If the no-action alternative is implemented, these potential effects should be addressed by additional Section 106 consultation and NEPA documentation, perhaps through the next Master Plan revision for the Forest Glen Annex.

#### 5.11.4 Alternative 4: Mothballing

**Direct.** Alternative 4 involves a change of viewpoint from the no-action alternative. Under this alternative, recognition of the potential for future use of the buildings is implied through a higher level of protection than that of Alternative 3. This higher level of protection would include conservation measures to address a stabilized level of structural and building envelope systems for the buildings, plus deactivation of mechanical/electrical systems in a manner that would allow such systems to be returned to active use in the future.

**Indirect.** Because the amount of funding that will be available to WRAMC for mothballing measures will be limited and difficult to obtain, this alternative will likely require an evaluation and judgment on the most appropriate buildings to “mothball”, and those, by implication, which would not be “mothballed.”

This evaluation and judgment action would be similar to that described under Alternative 1, only it would occur prior to, or in anticipation of, some unknown future disposition of the property. It would, by implication, identify buildings considered by the Army and other interested parties (including but not limited to the SHPO and ACHP) to have both value as historic properties and value for future use, thus requiring a higher level of protection. It would be most advantageous to focus available funding on those properties considered to be of higher significance within the historic context of the site, rather than to disperse available funding across all the properties with less effective protection for each one. Those

properties of lesser importance would be mitigated. It is expected that the Army would seek to negotiate an MOA or PA with the SHPO regarding specific mothballing actions.

In the short term, implementing Alternative 4 could result in adverse effects on some of the historic properties, but it would nonetheless represent an improvement over the current situation. In the long term, however, the problem of finding an adaptive reuse for the NPSHD might not be resolved and the mothballed properties could eventually be lost.

## 5.12 Visual and Aesthetic Values

### 5.12.1 Alternative 1: Excessing the NPSHD

**Direct.** The Army's proposed action of reporting the NPSHD as excess is an administrative action that will have no direct impact on the visual resources of the site.

**Indirect.** Ultimately, reuse of the NPSHD property will indirectly affect the visual resources of the site. The type and nature of the impact will depend on the judgments about which buildings to retain and what limitations to place on new construction, which will be enforced by deed restrictions or federal regulations for historic properties, depending on whether the property is transferred to another federal agency or disposed of to a non-federal agency. Existing buildings may be replaced by buildings with more or less visual and aesthetic value and additional buildings may be constructed on the site.

Removing the intrusive, nonhistoric laboratory buildings in the NPSHD and replacing them with compatible new buildings or revegetating their footprint as open space would have a beneficial effect on aesthetic values. (This action potentially could occur under any of the alternatives.)

Removing historic buildings, constructing new buildings that are not compatible with existing buildings in style, or removing mature trees could result in adverse effects on aesthetic values. Rehabilitation of existing historic buildings and reclaiming historic landscapes would improve aesthetic values. Any adverse effects are not expected to reach significant levels, because they would be subject to control by preservation deed restrictions and local zoning and site development regulations, for a non-federal owner, or by existing regulations and NCPC review of federal agency building plans.

### 5.12.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** The Army's proposed action of reporting the NPSHD as excess is an administrative action that will have no direct impact on the visual resources of the site.

**Indirect.** As discussed under Alternative 1, reuse of the NPSHD and the additional parcels will indirectly affect the visual resources of the site. The type and nature of the impact will depend on the judgments made about which buildings to retain and what limitations to place on new construction. If the intrusive, nonhistoric structures on Parcel 3, which are visible from the NPSHD, are removed by the Army (salt dome) or the new owner (warehouse) and are replaced more visually compatible new buildings, a beneficial effect on

aesthetic values would result. Another intrusive structure, Building 189 on Parcel 2, will be removed by the Army before excessing and disposal occurs.

### 5.12.3 Alternative 3: No-Action

*Direct.* The no-action alternative would continue the low level of maintenance and use by the Army. It would have no immediate impact on the current visual resources of the site.

*Indirect.* In the short term, removing the intrusive, nonhistoric “Sleep Lab” (Building 189) on Parcel 2 will have a beneficial effect on aesthetic values. Over the long term, the no-action alternative has the potential for adverse effects on visual resources, as the NPSHD buildings continue to deteriorate. Significant impacts are not expected because, as discussed previously (section 5.11 “Cultural Resources”), some type of mitigation would need to be taken regarding the adverse effect of deterioration on these historic properties.

### 5.12.4 Alternative 4: Mothballing

*Direct.* Alternative 4 would involve conservation measures to preserve the structural and building envelope systems for the historic buildings, which could directly result in certain adverse but not significant effects on visual resources, such as boarding up windows.

*Indirect.* The long-term effects of mothballing historic buildings on the visual resources of the site would likely be similar to, but less serious than, the effects of the no-action alternative.

## 5.13 Social and Economic Environment

### 5.13.1 Alternative 1: Excessing the NPSHD

*Direct.* Declaring the NPSHD to be an excess property is an administrative action that will have no direct effect on population, labor force, employment, income, community services, or public safety services.

*Indirect.* Excessing the NPSHD will allow for its disposal and reuse. Currently, the buildings on the property are unoccupied except for a few employees, mostly in the fire station and power plant, and about 40 transient residents in the homeless shelter. Any type of reuse of this property will increase population on the site, either residential or workforce (daytime), but not substantially in comparison to regional and local growth trends.

However, any additional population could result in some increased demand on schools, fire and police services, recreation, and other community resources. Without a definable reuse scenario, it is not possible to quantify the potential population-related indirect impacts associated with reuse of the NPSHD and optional parcels.

If the property is sold and developed in the private sector, Montgomery County will have the opportunity to control potential effects on schools and other community services through the zoning process and the county's Adequate Public Facilities Ordinance. The current zoning of the property is low-density single-family residential (R-90), but rezoning to allow other uses more compatible with the existing buildings is expected. Because of

county concerns about traffic, a highly dense reuse is not likely. If the property is sold to a private-sector owner, proffers and increased property tax revenues can help finance any additional services needed.

If the property is transferred to another federal agency, impacts on schools are less likely and the county can seek to reduce effects on other community services through the NCPC intergovernmental review process and by negotiating cooperative agreements or memoranda of understanding with the new federal owner, as appropriate.

Additionally, through the GSA's screening and disposal process, Montgomery County will have the opportunity to acquire the property for certain types of public benefit uses such as education, recreation, or health services, which (if feasible) would have a beneficial effect on those types of community services.

The effect on the local economy of redeveloping the NPSHD will be beneficial but not significant, given the size of the property and the constraints preventing intense development there. If it goes to the private sector, the property will begin to generate revenue for Montgomery County through property and other local taxes. Even transfer to another federal agency could generate some revenue, through income taxes on employees living in the county or sales taxes on supplies purchased locally.

Construction will create temporary jobs and expenditures for goods and services. Any nonresidential use of the property will create (or relocate) some permanent jobs, as well as ongoing expenditures for good and services, which will generate minor but long-term economic benefits through the process of spending and respending within the regional economy.

**Environmental Justice.** On February 11, 1994, President Clinton issued *Executive Order 12898*, "Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations." The order requires that federal agencies conduct their programs, policies, and activities that substantially affect human health or the environment so as not to have adverse or disproportionately high effects on minority populations or low-income populations. By memorandum of February 11, 1994, the President directed the EPA to ensure agencies' analyses of environmental effects on minority and low-income communities, including human health, social, and economic effects.

Analysis of demographic data for the Census tracts surrounding the NPSHD and the Forest Glen Annex has not identified any minority or low-income communities that will be adversely or disproportionately affected by Alternative 1.

**Risks to Children.** On April 21, 1997, the President issued *Executive Order 13045*, "Protection of Children from Environmental Health Risks and Safety Risks," which recognizes that a growing body of scientific knowledge demonstrates that children may suffer disproportionately from environmental health and safety risks. This executive order requires federal agencies, to the extent permitted by law and mission, to identify and assess such environmental health and safety risks.

No disproportionate environmental health and safety risks to children are anticipated. There are no onsite housing, schools, day care centers, recreational facilities, or other places

occupied or frequented by children located within the NPSHD itself, but the child care center and Fisher House (guesthouse for families of hospital patients, including children) are nearby, on Stephen Sitter Avenue. The residential neighborhood of Forest Glen Park is the closest offsite location from which children could have access to the NPSHD. Other residential areas in the vicinity of NPSHD are separated from the installation by fences, major roadways, and the CSX rail line.

Because the NPSHD buildings are not occupied and are not open to the public, hazardous materials like friable asbestos, lead-based paint and radon do not currently present health risks to children. Future abatement that may be required for these materials will depend on the future use of the property, residential or non-residential, but will most likely be the responsibility of the new owner. There are no known emissions or releases of hazardous materials from the NPSHD that could present disproportionate health risks to children.

### 5.13.2 Alternative 2: Excessing the NPSHD with Additional Parcels

**Direct.** Declaring the NPSHD to be an excess property is an administrative action that will have no direct effect on population, labor force, employment, income, community services, or public safety services.

**Indirect.** Excessing the NPSHD and additional parcels will allow for their disposal and reuse. Currently, the buildings on the property are unoccupied except for a few employees in the fire station and power plant on NPSHD and the warehouse on Parcel 3. Residential population is limited to about 40 transient residents in the homeless shelter. Building 189 on Parcel 2 is in the process of being vacated, with its activities and employees relocated to the new WRAIR building.

As discussed under Alternative 1, any type of reuse of these parcels will increase population on the site, either residential or workforce (daytime), but not substantially in comparison to regional and local growth trends.

Excessing the additional parcels could enhance the marketability of the NPSHD and increase the likelihood of achieving an economically viable reuse for the NPSHD property. However, development of the additional parcels also could increase the potential intensity (i.e., the number of housing units or area of commercial space) of the resulting development, which could increase the level of associated impacts on community services. Montgomery County will have the opportunity to control potential effects on schools and other community services through the zoning process (or through the NCPC review process if the property goes to a new federal owner.) No discernable difference in inputs to the regional economy over Alternative 1 is expected.

**Environmental Justice.** Analysis of demographic data for the Census tracts surrounding the NPSHD and the Forest Glen Annex has not identified any minority or low-income communities that will be adversely or disproportionately affected by Alternative 2.

**Risks to Children.** Excessing the additional parcels is not expected to disproportionately increase environmental health and safety risks to children.

### 5.13.3 Alternative 3: No-Action

**Direct.** The no-action alternative would continue indefinitely the current low level of Army use of the NPSHD property, which will have no short-term or other direct impacts on social or economic resources.

**Indirect.** The no-action alternative will result in adverse indirect effects on public safety, the local real estate market, and recreational values. No indirect effects on population, community services, or the regional economy are expected.

Over the long term, Alternative 3 could result in unlikely but potentially serious effects on public safety. The longer the buildings sit vacant, the greater is the chance of another fire being caused by lightning, electrical failure, or trespassers. Like the Odeon fire, several local fire companies could be involved in containing a catastrophic fire at the NPSHD. In an extreme worst-case scenario, fire could spread to adjoining forested areas or residential properties, resulting in loss of property and natural resources, and could even result in personal injury or death of firefighters or residents.

In addition, ongoing deterioration could eventually cause structural integrity of the buildings to be lost, resulting in the collapse of exterior walls or other elements (such as porches or bridges) and posing an unlikely, but potentially serious, safety risk to people passing through the property at the time. WRAMC's routine maintenance program, as well as the security measures that have been employed to reduce vandalism, will reduce these types of risks but cannot guarantee that they will never occur.

Alternative 3 will have no discernable effect on the regional economy. However, the longer the property remains unoccupied, the greater would be the potential for localized losses, primarily to real estate values. Routine maintenance by the Army will not be able to keep the NPSHD buildings and grounds from continuing to deteriorate visibly over time. The property could be subject to further vandalism, structural collapse, or fire damage. Because real estate investment often depends on perception, this could have a negative effect on the marketability and value of nearby residential properties, and possibly even on the investment climate for the local business district or nearby light industrial areas. Although this represents a continuation of the existing situation, these adverse effects could ultimately reach significant levels over a very long period of time. However, another action will likely be proposed for the NPSHD before the situation reaches the point of locally significant economic impacts.

Finally, as the NPSHD buildings continue to deteriorate, their recreation value to the local community will decline irretrievably. Already, community use of the Ballroom has been terminated due to fire safety risks. In the long term, the property may no longer be safe to walk through, bringing even passive recreation uses to an end. This long-term impact on recreation would be adverse but not significant, because the NPSHD is part of a military property and public access to such properties for recreation is desirable (when feasible and consistent with mission) but it is neither required nor assured.

**Environmental Justice.** No adverse or disproportionate impacts to minority or low-income communities are anticipated.

**Risks to Children.** Given the physical condition of some of the buildings and unstable trees on the NPSHD, the no-action alternative will present some degree of physical safety risk, which could increase over time, to children who live in the surrounding area and who might trespass onto the NPSHD. However, security measures that have been employed to reduce vandalism also should help keep unaccompanied children away from the NPSHD buildings.

#### 5.13.4 Alternative 4: Mothballing

**Direct.** No impact. Alternative 4 will require the Army to take steps to secure the buildings and retain the NPSHD indefinitely as a vacant property, until some other decision is reached about their ultimate disposition. This alternative represents an ameliorated continuation of the existing situation and will have no short-term or other direct impacts on social or economic resources.

**Indirect.** Indirect impacts of Alternative 4 will be similar to, but less severe than, the no-action alternative. Adverse but not significant impacts are anticipated. If the property remains vacant for a long time under Alternative 4, some minor to moderately adverse effects on quality of life in the surrounding residential communities could occur. Although mothballing measures will be designed to prevent major deterioration of the historic buildings, the buildings and grounds will likely depreciate visibly over time. These conditions could have a negative effect on the character and perception of the surrounding neighborhoods. Because this represents an ameliorated continuation of the existing situation, however, the impacts are not considered to be significant under the criteria described in subsection 5.2.1.

**Environmental Justice.** No adverse or disproportionate impacts to minority or low-income communities are expected.

**Risks to Children.** Potential safety risks to children under Alternative 4 will be similar to the no-action alternative, but somewhat less likely.

### 5.14 Cumulative Impacts

CEQ regulations (40 CFR 1508.7) provide that cumulative impacts result from the incremental impact of an action when added to other past, present, and reasonably foreseeable future actions regardless of what agency undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

Analysis of impacts in this EA of the excessing, no-action, and mothballing alternatives has been in terms of the effects on the resource categories. The following discussion addresses the potential cumulative impacts relevant to each of the three alternatives, not only in terms of the specific resource areas previously analyzed but also in terms of regional levels.

Other future actions that can be expected to contribute to cumulative impacts that are expected to occur in the future and in the same geographic area and general time frame include:

- Full occupation of the new WRAIR facility at the Forest Glen Annex
- Replacement, elsewhere at the Forest Glen Annex, of active facilities currently on the land being considered for excessing
  - The current fire station on the NPSHD (under Alternative 1)
  - The warehouse and salt dome on Parcel 3 (under Alternative 2)
- Redevelopment of downtown Silver Spring

The WRAIR facility was previously evaluated in an EA prepared for the 1992 Forest Glen Master Plan (RGH, 1990). Construction of the replacement facilities will be evaluated in separate NEPA documents.<sup>1</sup> The 1990 EA previously evaluated sites for a new fire station and a new warehouse. Those sites, in the southern portion of the Forest Glen Annex near Brookville Road, are expected to be carried forward as the preferred sites for the fire station and warehouse (to replace those on excessed parcels), with alternative sites to be addressed in the new EA(s). The salt storage dome could be physically relocated to a new site, which would need to be graded and improved; no new site for this facility was addressed in the 1992 Master Plan, but it would likely be on or near the warehouse site (Porter, personal communication, 8/9/99).

#### 5.14.1 Alternative 1: Excessing the NPSHD

**Land Use.** By bringing the NPSHD back to productive use, at the same time as other underutilized properties in Silver Spring are reused, Alternative 1 will result in positive effects on land use. As discussed previously, incompatible uses can be avoided through local land use controls or the NCPC intergovernmental review process, as applicable. Relocating the fire station to the maintenance zone in the southern portion of the Forest Glen Annex would be compatible with adjacent offsite land use.

**Air Quality.** Adverse but not significant cumulative impacts are possible. Redevelopment at NPSHD and in Silver Spring, in the same general time period as construction of a new fire station at Forest Glen Annex, will result in cumulative emission changes and fugitive dust from demolition. These impacts would be temporary and can be controlled through the use of approved dust suppression and construction control measures. New heating sources could impact the area's air quality but must conform to applicable local and state regulations. Reoccupation of now vacant properties also will generate some mobile emissions from new vehicular traffic. Cumulative impacts are not expected to be significant, because controlling vehicular traffic at NPSHD is expected to be one of the County's goals in zoning and approving a new use for the property (or in commenting through the NCPC on proposed reuse by a federal agency) and also because one of the attractions of Silver Spring is its accessibility to Metro.

**Noise.** Cumulative effects from construction noise are possible, because redevelopment of NPSHD and the replacement fire station could occur at the same time. These impacts would be temporary and any private developer will be subject to local controls on construction

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<sup>1</sup> Expected to be completed in FY 2000



noise. In addition, control of sustained noise nuisances through the design of any redevelopment is one of Montgomery County's goals expressed in the North and West Silver Spring Master Plan. Although federal agencies are not legally subject to these controls, voluntary compliance would normally be expected if a federal agency acquires the NPSHD. Cumulative effects with the development of NPSHD and downtown Silver Spring are not expected because of the distance between the sites.

**Water Resources.** Cumulative effects on surface water from construction at the NPSHD and replacement fire station are possible, but are not expected to be significant because the anticipated sites are in the watersheds of different streams and because compliance with state and local regulations for erosion and sedimentation control and for forest conservation will be required (or voluntarily complied with, in the case of the Army or another federal agency). Because of the distance between NPSHD and downtown Silver Spring, cumulative effects are not expected.

It is unlikely that there will be cumulative effects on groundwater. Although there is a remediation system operating at Forest Glen Annex near Buildings 500 and 512 to clean up groundwater contaminated with free-phase petroleum hydrocarbon products, the location is about 2,000 feet south-southeast of the NPSHD. There are no other known areas of contamination either within the Forest Glen Annex or outside of the Annex (e.g., local gas stations) that are likely to impact the NPSHD. There are no anticipated cumulative impacts on groundwater quantity, because none of the actions would withdraw or change the rate of recharge of groundwater.

**Geology.** There should be no cumulative impacts on soil, geology, or topography. Although new construction for reuse selected may lead to increased erosion as an indirect impact, the impact is limited to what is occurring within the NPSHD itself. It is unlikely that replacement of the fire station outside of the NPSHD will have an impact on the NPSHD because engineering controls are available and are easily implemented. Projects in Silver Spring, as well as at NPSHD, will be required to comply (or in the case of federal agencies would be expected to voluntarily comply) with state and local regulations for erosion control.

**Infrastructure.** No cumulative impacts are expected because sufficient capacity exists in local services. NPSHD onsite infrastructure is not directly connected to any infrastructure (except roads, discussed below) serving Silver Spring. Upgrading or replacing NPSHD systems will improve their efficiency and reduce any potential demand caused by inefficiencies. Infrastructure serving WRAIR or the new fire station should not be affected by excessing the NPSHD. Some potential easement issues could arise if WRAMC excesses the NPSHD alone, because some NPSHD systems terminate in Parcels 2 and 3. Any such issues should be addressed under the Army's new initiative for privatizing utilities.

**Transportation.** Any type of reuse of NPSHD will result in an increase in vehicular traffic over what exists currently. The magnitude and impact of additional traffic depends directly on the type of reuse development planned for this property. Redeveloping NPSHD will likely result in some cumulative traffic impacts with the WRAIR project at nearby intersections and, possibly, at major intersections along Georgia Avenue with traffic accessing newly redeveloped sites in downtown Silver Spring. The replacement fire station

could result in minor cumulative traffic impacts with the new WRAIR facility in the southern portion of Forest Glen Annex.

When a specific reuse scenario is defined for NPSHD, a complete traffic/transportation study will be necessary to quantify and qualify potential cumulative impacts to the surrounding roadway system. Montgomery County will have the opportunity to control these cumulative impacts through the rezoning process and the county's Annual Growth Policy, if the property goes to a non-federal entity, or through the NCPC intergovernmental review process if the property is transferred to another federal agency.

**Hazardous and Toxic Materials.** No cumulative impacts on hazardous and toxic materials are expected. Use of these materials in the remainder of the Forest Glen Annex is well-documented and controlled. The new fire station will not use any more hazardous and toxic materials or generate more hazardous waste than the existing one. There are no known locations where hazardous and toxic materials are used within a distance from the Annex that might have an impact.

**Biological Resources.** Cumulative indirect adverse impacts to biological resources in the NPSHD area, including increased erosion and sedimentation or loss of habitat, are possible as an indirect impact of construction, but are not expected to be significant. The new owner of the NPSHD property will be required to comply with state and local regulations affecting construction impacts. Site constraints such as steep slopes and protective restrictions on historic buildings will limit impacts. Construction of the WRAIR parking lot has previously resulted in the loss of some mature woodland and other cumulative losses to habitat may result from construction for reuse of the NPSHD. Any fauna displaced from habitat at these locations NPSHD should be able to relocate in Rock Creek Park, but some cumulatively adverse effects in the park from such faunal movements are possible. Compliance with Maryland's Forest Conservation Act would minimize any further losses at NPSHD. Compliance with state and local regulations regarding wetlands, erosion and sediment control, and avoiding disturbance of forested habitats during the breeding season for Forest Interior Dwelling Birds can minimize adverse impacts on habitat. There are few biological resources in downtown Silver Spring.

**Cultural Resources.** Some cumulative effects on historic properties at the NPSHD and in Silver Spring are possible. Beneficial effects will result from adaptive reuse of NPSHD buildings and the Silver Theater. Complete preservation of all historic properties may not be possible in a complete disposal of the NPSHD. Any removal of historic buildings at NPSHD, although mitigated, would occur in the context of the loss of the Armory in Silver Spring. There are no historic properties on the new fire station site.

**Demographics.** Minimal or no cumulative effects on population or labor force are expected in comparison to regional and local growth trends. Neither the NPSHD nor the Silver Spring projects are large enough to substantially reverse migration trends towards the outer jurisdictions, but could have some minor effects.

**Regional Economy.** Returning the NPSHD and other underutilized properties in the Silver Spring area to full economic use will have cumulatively beneficial effects on the local business climate and minor but beneficial effects on the regional economy. The

revitalization of downtown Silver Spring could result in a more favorable investment climate for the redevelopment of NPSHD, although they are not physically very close or directly related in function. The reverse effect (NPSHD on downtown Silver Spring) is not likely.

**Quality of Life.** Redeveloping the NPSHD and other underutilized properties in Silver Spring will increase residential or workforce populations, which could result in some increased demand for schools and other community resources. Montgomery County has the opportunity to control potential effects on schools and other community services through the zoning process and the county's Adequate Public Facilities Ordinance, or through the NCPC intergovernmental review process if the property is transferred to a federal agency. In addition, for private sector nonresidential development, increased tax revenues could help finance any additional services needed.

**Public Safety.** Increased residential and workforce populations at the NPSHD and other underutilized properties in Silver Spring will result in some increased demand for public safety resources, which can be controlled by the local government. The increased workforce population at WRAIR will have little or no cumulative effect because they will be served by WRAMC's own fire and police departments. Replacement of the fire station with a new, modern facility will ensure continued service and will improve working conditions for WRAMC's fire fighters.

#### 5.14.2 Alternative 2: Excessing the NPSHD with Additional Parcels

Most of the cumulative (indirect) effects of excessing the NPSHD with additional parcels will be very similar to, but somewhat greater than, the effects described in the previous section for excessing the NPSHD alone.

**Land Use.** By bringing the NPSHD back to productive use, at the same time as other underutilized properties in Silver Spring are reused, Alternative 2 will result in positive effects on land use. Incompatible uses can be avoided through local land use controls or the NCPC intergovernmental review process, as applicable. Relocating the warehouse and salt dome to the supply and storage zone in the southwest portion of the Forest Glen Annex would be compatible with adjacent offsite land use.

**Air Quality.** Adverse but not significant cumulative impacts are possible, as discussed for Alternative 1. Redevelopment at NPSHD and in Silver Spring, in the same general time period as construction of a new fire station and warehouse at Forest Glen Annex, will result in cumulative but temporary emission changes and fugitive dust, which can be controlled through the use of approved dust suppression and construction control measures. New heating sources on the NPSHD and additional parcels could have a minor impact on the area's air quality but must conform to applicable local and state regulations. Redevelopment of the NPSHD and additional parcels also will generate some mobile emissions from new vehicular traffic, which are not expected to be cumulatively significant, because controlling vehicular traffic at NPSHD is one of the County's goals and also because one of the attractions of downtown Silver Spring is its accessibility to Metro.

**Noise.** Cumulative effects from construction noise are possible, because the timing of redevelopment at NPSHD, Parcels 2 and 3, and the replacement facilities could overlap.

Because Parcels 2 and 3 are near residential neighborhoods, nuisance noise impacts would be greater than for NPSHD alone. These impacts would be temporary and subject to local controls on construction noise. Cumulative effects with the development of NPSHD and downtown Silver Spring are not expected because of the distance between the sites.

**Water Resources.** Cumulative effects on surface water from construction at the NPSHD, Parcels 2 and 3, and the replacement facilities are not expected to be significant because the sites are in the watersheds of different streams and because erosion and sedimentation control and forest conservation will be complied with. Because of the distance between Forest Glen Annex and downtown Silver Spring, cumulative effects on surface water are not expected. Cumulative effects on groundwater are unlikely.

**Geology.** There should be no cumulative impacts on soil, geology, or topography. Although new construction may lead to increased erosion, it would be limited to the NPSHD and additional parcels to the north of Forest Glen Annex, and replacement sites in the southern portion of the Annex. Engineering controls to reduce such impacts are available and easily implemented. Projects in Silver Spring, as well as at the excessed parcels and replacement sites, will be required to comply (or in the case of federal agencies would be expected to voluntarily comply) with state and local regulations for erosion control.

**Infrastructure.** No cumulative impacts are expected because sufficient capacity exists in local services. Excessing Parcels 2 and 3 along with the NPSHD will avoid potential easement issues that could arise if WRAMC retains those parcels, because some NPSHD systems terminate in Parcels 2 and 3.

**Transportation.** As discussed for Alternative 1, any reuse of NPSHD and the additional parcels will result in an increase in vehicular traffic over what exists currently. The magnitude and impact of additional traffic depends directly on the type of reuse development planned for these parcels. When a specific reuse scenario is defined for NPSHD, a complete traffic/transportation study will be necessary. Cumulative traffic impacts are expected with the WRAIR project at nearby intersections and at major intersections along Georgia Avenue. The replacement facilities could result in some cumulative traffic impacts with the new WRAIR facility in the southern portion of Forest Glen Annex. Cumulative traffic impacts are not expected with the NPSHD at the northern end of Forest Glen Annex, because traffic accessing the warehouse and salt dome would be expected to approach them from Brookville Road and nearby intersections, not from Linden Lane. As noted by the 1992 Forest Glen Master Plan, concentrating all of WRAMC's supply and storage functions near the intersection of Brookville Road and Stephen Sitter Avenue will reduce the truck traffic to and from the existing warehouse on Linden Lane (unless the new owner of Parcel 3 retains the warehouse for a similar use).

**Hazardous and Toxic Materials.** No cumulative impacts on hazardous and toxic materials are expected. The replacement facilities will not use any more hazardous and toxic materials or generate more hazardous waste than the existing facilities do.

**Biological Resources.** Cumulative indirect adverse impacts to biological resources in the NPSHD area are possible, but are not expected to be significant. Impacts would be similar to, but potentially greater than, those indicated for Alternative 1 because Alternative 2

provides up to 10 additional acres of developable land. The greatest impact to terrestrial biota is likely to result from constructing the replacement warehouse in the southern portion of Forest Glen Annex, because the anticipated site is comprised largely of mature woodland (RGH, 1990).

**Cultural Resources.** Alternative 2 could slightly increase cumulative effects on historic properties with redevelopment the NPSHD and in Silver Spring. There are three historic buildings on Parcels 2 and 3 (although one has been condemned). Complete preservation of all historic properties may not be possible in a complete disposal of the NPSHD. Any removal of historic buildings at NPSHD and the additional parcels, although mitigated, would occur in the context of the loss of the Armory in Silver Spring. Beneficial cumulative effects will result from adaptive reuse of other NPSHD buildings and the Silver Theater. There are no known historic properties on the anticipated sites for the replacement facilities.

**Demographics.** Minimal or no cumulative effects on population and labor force are expected, in comparison to regional and local growth trends. The replacement facilities will have no effect on population.

**Regional Economy.** As discussed under Alternative 1, returning both the NPSHD and other underutilized properties in the Silver Spring area to full use should have cumulatively beneficial effects on the local business climate and minor but beneficial effects on the regional economy. Redevelopment of the additional parcels and the replacement facilities will add only minor, and temporary, cumulative beneficial effects to the regional economy.

**Quality of Life.** Redeveloping the additional parcels along with the NPSHD and other underutilized properties in Silver Spring could somewhat increase residential or workforce populations, which could result in some increased demand for schools and other community resources. As previously discussed, Montgomery County has the opportunity to control these potential impacts through the zoning and site review process, or through the NCPC intergovernmental review process if the property is transferred to a federal agency.

**Public Safety.** Increased residential and workforce populations at the NPSHD and other underutilized properties in Silver Spring could somewhat increase demand for public safety resources, which can be controlled by local government review of development plans. Relocation of the warehouse and salt dome will not generate additional demand.

### 5.14.3 Alternative 2: No-Action

Because this alternative represents no change from the current condition, cumulative impacts with other projects are generally not expected. Not redeveloping the NPSHD is not expected to adversely affect the Silver Spring revitalization effort; however, if the Silver Spring projects also failed, then some cumulative adverse effects on the local real estate market are possible. On the NPSHD itself, cumulative adverse effects on soil and biological resources (from demolishing non-historic laboratory buildings) are not expected to rise to significant levels. Long-term cumulative adverse effects on historic, visual, and socioeconomic resources related to deterioration of the NPSHD's historic buildings should be addressed by future master planning, NEPA evaluation and Section 106 consultation before significant levels are reached.

#### 5.14.4 Alternative 3: Mothballing

Because this alternative represents little change from the current condition, cumulative impacts with other projects are not expected.

### 5.15 Mitigation

Measures to reduce or minimize impacts of proposed actions can include:

- Avoiding the impact altogether by stopping or modifying the proposed action
- Minimizing the impact by limiting the degree or magnitude of the proposed action and its implementation
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment
- Reducing or eliminating the impact over time through preservation and maintenance operations during the life of the proposed action
- Compensating for the impact by replacing or providing substitute resources or environments

In this EA, the Army's commitments to mitigation are limited to direct adverse impacts associated with the proposed Army action of reporting the NPSHD (with or without additional parcels) as excess property, and all direct and indirect impacts associated with the no-action or mothballing alternatives.

In general, mitigation of adverse *indirect* impacts associated with disposal by GSA and the subsequent action of reuse of the NPSHD property, after it is transferred to a new user, will be the responsibility of other federal, state, and local agencies or private entities that implement specific reuse and development plans. Potential measures by non-Army entities that would avoid or reduce adverse impacts are provided here only as examples and recommendations to be considered by future landowners and regulatory agencies.

Specific mitigation actions for construction of the replacement facilities (the fire station under Alternative 1 or the fire station, warehouse and salt dome under Alternative 2) will be addressed in separate NEPA documents for those actions. In general, they would be similar to the recommended mitigation measures for future landowners that are discussed here (with the exception of those applicable to historic properties, which will not be affected).

#### 5.15.1 Actions by the Army

##### 5.15.1.1 Alternative 1: Excessing the NPSHD

No potentially significant direct adverse impacts have been identified from declaring the NPSHD to be an excess property. As discussed in subsection 2.2, the Army's involvement in the prescribed process for federal property disposal is essentially limited to preparing the "Report of Excess Real Property," screening the property for potential future use within DOD, and custody of the property until disposal. Subsequent actions in the disposal process are the responsibility of GSA.

The Army as the “holding agency” retains custody and accountability for excess real property and is responsible for the protection and maintenance of such property pending its transfer to another federal agency or its disposal to a non-federal entity. The Army will protect and maintain the property in accordance with AR 405-90, “Disposal of Real Estate” and Technical Memorandum (TM) 5-801-2 “Historic Preservation: Maintenance Procedures.”

The Army likely will be a participant in GSA's negotiations for an agreement with the SHPO and other responsible agencies, regarding any future deed restrictions that will be binding on future owners of the property. This anticipated agreement will help to reduce indirect adverse impacts on historic properties.

#### **5.15.1.2 Alternative 2: Excessing the NPSHD with Additional Parcels**

No potentially significant direct adverse impacts have been identified from declaring the NPSHD and additional parcels to be excess property. As discussed under Alternative 1, the Army's involvement in the prescribed process for federal property disposal is essentially limited to preparing the “Report of Excess Real Property,” screening the property for potential future use within DOD, and custody of the property until disposal. The Army likely will be a participant in GSA's negotiations for an agreement with the SHPO and other responsible agencies, which will be the primary means of resolving indirect adverse impacts on historic properties.

#### **5.15.1.3 Alternative 3: No-Action**

Potentially significant adverse indirect (long-term) impacts on historic properties have been identified from the no-action alternative. However, the no-action alternative represents a continuation of current conditions, rather than a new action. If the no-action alternative is selected and carried out for an extended period of time, the Army will consult further with the SHPO, in accordance with Section 106 of the NHPA, regarding potential mitigation for these effects. Additional NEPA documentation may also be necessary.

Potential adverse effects on public safety also have been identified, related to the continued deterioration and vacant status of the buildings under the no-action alternative. In the short term, these effects will be controlled as much as practicable by WRAMC's routine maintenance and repair program. In the long term, if the no-action alternative is implemented, the Army may need to consider stronger measures, in consultation with the SHPO, up to and including the removal of unstable trees and structures, in order to prevent potentially significant threats to public safety.

Adverse but not significant effects on land use and infrastructure in the NPSHD are also anticipated in the long-term, as the condition of the facilities declines and they become unsuitable to support the land uses associated with fully operational conditions. Mitigation for these effects will not be required because the Army has no further need for the facilities.

Mitigation for the effects of demolishing the non-historic laboratory buildings will consist of adhering to applicable laws, regulations, and best management practices for the control of sedimentation and erosion and the disposal of debris that may contain hazardous materials (such as ACM or lead-based paint).

#### 5.15.1.4 Alternative 4: Mothballing

No potentially significant adverse impacts have been identified from Alternative 4. Adverse but not significant effects on historic properties are possible. This alternative will likely require evaluation and judgment on the most appropriate buildings to mothball, in order to focus limited resources on the properties considered to be of higher significance. If a decision not to mothball any properties of lesser importance is made, an adverse impact on those properties will result and will be mitigated to a non-significant level by recordation, in consultation with the Maryland SHPO and the ACHP.

#### 5.15.2 Potential Actions by Others

As previously discussed, other (non-Army) entities will be responsible for evaluating impacts from actual reuse proposals and for minimizing or mitigating impacts associated with these reuse actions. The following are suggested measures that could be taken by other entities to avoid or reduce adverse impacts associated with reuse of the NPSHD.

**Land Use.** Adverse impacts associated with development can be reduced through sound site planning and design, and identification and development of appropriate supporting infrastructure systems. Impacts also can be reduced by developing the property in a manner consistent with its historic site layout and with surrounding land uses, guided by the recommendations of the *North and West Silver Spring Master Plan*, including any minor amendments to the master plan that are made for this property.

**Air Quality.** The permit system of the CAA generally provides effective control of potential stationary air-emissions sources. Adherence to the SIP provisions could address that source category. Impacts from motor vehicle emissions can be reduced by limiting the intensity of development of the property, through the local zoning process or the NCPC intergovernmental review process, as applicable.

**Infrastructure.** Coordination with local service providers will be required to determine the appropriate capacity and phasing of improvements to the infrastructure.

**Hazardous and Toxic Materials.** The DOD's commitment to clean up all hazardous waste areas consistent with federal, state, and local regulations, and consistent with specific future uses of land, ensures that no adverse impacts will occur. Proper licensing and control of any future hazardous wastes generated by reuse activities will ensure no further contamination to the area.

**Biological Resources.** Site constraints such as steep slopes and protective restrictions on historic buildings also will limit impacts on biological resources. Compliance with state and local regulations regarding wetlands, forest conservation, erosion and sediment control, and avoiding disturbance of forested habitats during the breeding season for Forest Interior Dwelling Birds can minimize adverse impacts on habitat.

**Cultural Resources.** It is expected that preservation covenants for the historic district will be documented in an agreement among GSA, the SHPO, the ACHP, and the Army, with participation by any consulting parties identified by GSA during its Section 106 consultation process. Adherence to the resulting deed restrictions will minimize adverse effects on historic properties.



**Visual and Aesthetic Resources.** Development in accordance with the recommendations of the *North and West Silver Spring Master Plan* and adherence to the any deed restrictions on historic properties will minimize adverse effects on the associated visual and aesthetic values.

**Social and Economic Environment.** Any adverse impacts on community facilities resulting from increased local population can be minimized by local zoning and enforcement of the Montgomery County Adequate Public Facilities Ordinance, or by the NCPC intergovernmental review process.

**Noise.** If the property goes to a non-federal entity, properly exercised local zoning controls and the recommendations of the *North and West Silver Spring Master Plan* would be expected to address potential noise sources, by ensuring separation between adjoining property uses, limits on hours of operation, and other means of noise abatement and control. If the property is transferred to a federal agency, review of building plans by the NCPC would be expected to address potential noise sources.

**Transportation.** Avoiding or minimizing adverse impacts related to traffic and transportation relies strongly on (1) either local zoning controls or local comments during NCPC intergovernmental review, and (2) completing a traffic/transportation study, once a specific reuse scenario is defined and before the site is reused. Some specific mitigation measures could include coordinating with local transit services, facilitating pedestrian activity, limiting access points to/from the site on Linden Lane, implementing a traffic minimization program, or operational and safety improvements on Linden Lane between Steven Sitter Avenue and New Castle Avenue.

## 6. Findings and Conclusions

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### 6.1 Unavoidable Adverse Environmental Effects

Because the Army's proposed action of reporting the NPSHD to GSA as an excess property (Alternative 1) with or without the additional parcels (Alternative 2) is an administrative action, there will be little or no direct impact on environmental or social and economic resources. The no-action and mothballing alternatives are similar to existing conditions, so the direct impacts of these alternatives also are few.

Some adverse indirect environmental impacts would be associated with the proposed action (excessing alternative), the no-action alternative and the mothballing alternative, but they are not expected to be significant.

Indirect impacts under the excessing alternative would mostly result from actions by other (non-Army) parties that will be made possible by the Army action of excessing the property, which will allow for its transfer or disposal to a new owner and the eventual reuse of the property.

The indirect impacts associated with the alternatives are described below.

**Alternative 1: Excessing the NPSHD.** Indirect, short-term, adverse impacts that are not considered significant are expected for air quality, noise, surface water, soil erosion, and biological resources. These impacts will cease when construction is complete.

Sustained indirect impacts on land use could occur if new owners propose uses for the NPSHD that are incompatible with the adjacent residential properties. However, a significant land use impact is unlikely because Montgomery County has control over the ultimate zoning and use of the site by private entities and will have a chance to comment on any proposed federal agency reuse through the NCPC intergovernmental review process.

Redevelopment of the property will result in new emissions from heating sources, which would be more efficient than the existing power plant, and some new vehicular emissions.

Sustained indirect impacts on the surrounding transportation system are possible, because any type of reuse of this mostly vacant property will result in an increase in vehicular traffic over what exists today. Once a specific reuse scenario is defined through the disposal process, a complete traffic and transportation study is recommended to quantify and qualify potential impacts to the surrounding system.

Declaring the NPSHD excess will initiate a process for evaluating the cultural resource value of the property in the broader atmosphere of potential public needs and private asset markets. Complete preservation of all historic properties may not be possible in a complete disposal, requiring judgments on the relative worth or hierarchical significance of various portions of the property. Some historic properties will likely require mitigation in order to retain others.

Reuse of the property will result in some level of increased demand for community services, which may be offset by increased tax and related revenues.

**Alternative 2: Excessing the NPSHD and Additional Parcels.** Short term and sustained indirect impacts will be similar to the impacts indicated for Alternative 1. Indirect impacts related to construction and reuse of the property would be somewhat increased by the additional parcels, which provide another 10 acres of developable land. However, this alternative offers a better chance of achieving an economically viable adaptive reuse of the NPSHD.

**Alternative 3: No-Action.** Over the long term, routine maintenance under the no-action alternative will not be able to prevent the continued and visible deterioration of the NPSHD. This will result in indirect long-term adverse effects on historic properties. Over the long term, without recordation and documentation or other forms of mitigation, this adverse impact could conceivably reach significant levels. Related adverse effects on the site's infrastructure, the surrounding land use, the local real estate market and property values, visual resources, public safety, and the quality of life in the surrounding neighborhoods also could result.

**Alternative 4: Mothballing.** The mothballing alternative will require the Army to take steps to secure the buildings and retain the NPSHD indefinitely as a vacant property, until some other decision is reached about their ultimate disposition. This will result in beneficial effects on the buildings that are mothballed but also could result in adverse effects (which can be mitigated by recordation), if not all buildings are selected for mothballing in order to focus available funding on the most significant properties. Other long-term, indirect adverse effects of mothballing would be similar to the no-action alternative but less severe.

## 6.2 Irreversible and Irretrievable Commitments of Resources

Irreversible and irretrievable resource commitments are related to the use of nonrenewable resources and the effects that use of these resources will have on future generations. Irreversible effects primarily result from use or destruction of a specific resource (for example, energy and minerals) that cannot be replaced within a reasonable time frame. Irretrievable resource commitments involve the loss in value of an affected resource that cannot be restored as a result of the action (for example, extinction of a threatened or endangered species).

The excessing, additional parcels, no-action, and mothballing alternatives all could indirectly result in an irreversible loss of at least some historic buildings. This is not considered an irretrievable loss because the historic value of the buildings will be preserved through recordation and documentation.

## 6.3 Short-Term Uses of Environment and Maintenance and Enhancement of Long-Term Productivity

Short-term uses of the biophysical components of the environment include direct construction-related disturbances and direct impacts associated with an increase in

population and activity that occur in less than 5 years. Long-term uses of the environment include those impacts occurring over a period of more than 5 years, including permanent resource loss.

Several kinds of activities could result in short-term resource uses that compromise long-term productivity. For example, loss of wetlands or other especially important habitats and consumptive use of resources at nonrenewable rates are examples of actions having effects on long-term productivity.

The two excessing alternatives evaluated in this EA assume levels of activity by other (non-Army) entities that would indirectly produce some impacts on certain resource areas, but these are short-term, and no effects on the maintenance and enhancement of long-term productivity are expected.

There are no especially important natural resources on or near the NPSHD site. Indirect impacts by other (non-Army) entities on forested habitat and other resources can be minimized by complying with state and local laws and regulations. The proposed action and alternatives will not involve deleterious impacts on maintenance and enhancement of long-term productivity.

## 6.4 Conclusion

The function of an EA is to (1) provide sufficient evidence and analysis for determining whether to prepare an EIS or a FNSI, (2) to aid a federal agency's compliance with NEPA when no EIS is necessary, by helping to identify better alternatives and mitigation measures, and (3) to facilitate preparation of an EIS when one is necessary.

An EIS is required when an EA (or other deliberation) has disclosed that a major federal action has the potential to cause significant environmental impacts. The function of an EIS is (1) to ensure that NEPA policies and goals are incorporated early into federal decision-making, (2) to provide a full and fair discussion of significant impacts, (3) to inform decision-makers and the public of reasonable alternatives that would avoid or minimize adverse impacts, and (4) to provide a basis for informed federal decision-making.

This EA has evaluated the impacts of the proposed action and alternatives on specific resource areas and has evaluated the cumulative impacts of the proposed action with other development activities in the surrounding area. The analysis indicates that there are no reasonably foreseeable, significantly adverse impacts associated with the Army's proposed action of reporting the NPSHD to the GSA as an excess property or with the Army's preferred alternative of reporting two additional parcels as excess along with the NPSHD. Additional NEPA documentation for the subsequent disposal action will be prepared by GSA.

Because no significant impacts have been identified, it is not necessary to prepare an EIS. Therefore, a FNSI will be prepared for this proposed action.

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## 8. Distribution List

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Walter Reed Army Medical Center

Ms. Nancy Sturgeon  
Community-Based Planning  
Montgomery County Department of Park  
and Planning

Silver Spring Fire Department  
Montgomery County

## Appendix A

### Public Involvement and Agency Coordination

## **1999 Public Involvement**

---

*Walter Reed Army Medical Center invites you to a*

# PUBLIC INFORMATION MEETING

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## Purpose of the Meeting

The Department of the Army is in the process of declaring the National Park Seminary Historic District (NPSHD) to be an excess property. This action will allow the General Services Administration (GSA) to screen, market, and transfer the NPSHD to a new owner.

GSA acts as the "real estate broker" for surplus Federal government property. The Army will retain ownership and control of the NPSHD until the property is transferred to a new owner.

This second public information meeting is intended to let community members know about the current status of this process. Representatives of the Army and GSA will be available to answer questions from the public.

## Environmental Assessment

As a part of the process, the Army is preparing an Environmental Assessment (EA), which describes existing environmental conditions on the NPSHD

*continued on page 2*

**Topic:** Update on the National Park Seminary Historic District

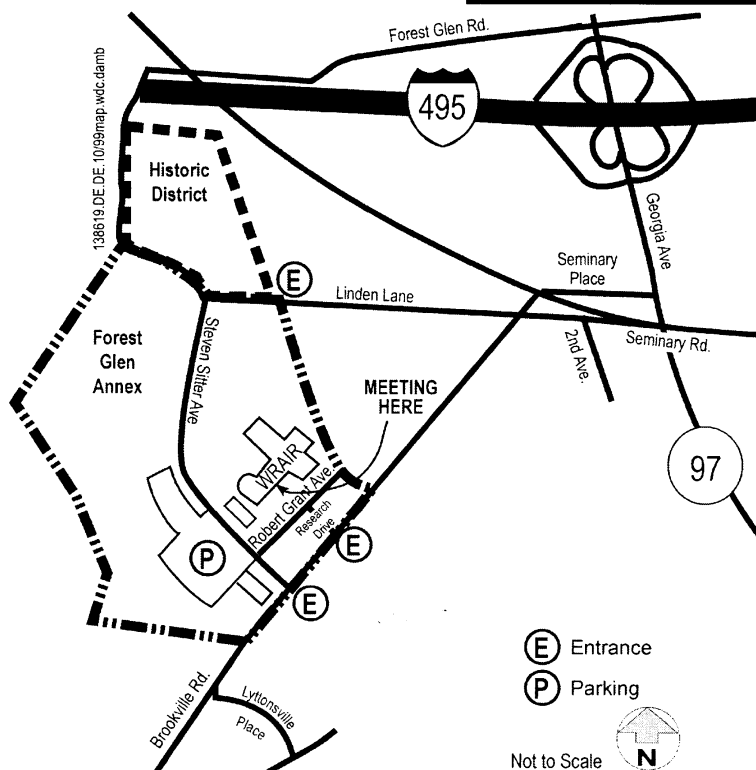
**When:** Thursday, October 28, 1999  
7:00 p.m. to 9:00 p.m.

**Where:** Walter Reed Army Institute of Research (WRAIR) Auditorium  
Building 503, Forest Glen Annex  
Silver Spring, MD

(See  
map  
below)

From I-495, take Georgia Avenue (exit 31 South). Turn right on Seminary Road (not Seminary Place) at the Exxon. Stay left at the fork where Seminary Road becomes Linden Lane. Turn left from Linden onto Brookville Road. Turn right into the 2<sup>nd</sup> Forest Glen Annex entrance, at Stephen Sitter Avenue. (The gate at Research Drive might be closed.) The new WRAIR building is one block ahead.

**Parking:** Park in the new WRAIR parking structure at the corner of Stephen Sitter Avenue and Robert Grant Road.



*continued from page 1*

and examines how the Army's decision to declare the property excess might affect the historic district and the surrounding area.

The Army's EA is now close to completion. Further along in the screening and disposal process, GSA will prepare additional environmental documentation on the potential effects of the disposal of the NPSHD. The meeting will discuss the findings of the EA to date and how the public can participate.

### For More Information

Please contact **Beverly Chidel**, Acting Public Affairs Officer:

Telephone: (202) 782-7177

E-mail: [beverly.chidel@na.amedd.army.mil](mailto:beverly.chidel@na.amedd.army.mil)

Mailing Address:

Ms. Beverly Chidel  
Attn: MCAT-PA  
Walter Reed Army Medical Center  
6900 Georgia Avenue, N.W.  
Washington, DC 20307-5000

### For Special Assistance

WRAIR Auditorium is wheelchair-accessible. If you require sign-language interpretation, or need other special assistance to be able to participate in this meeting, please contact **Beverly Chidel** by **October 25, 1999**.

### Security

WRAIR is a secure research facility. **Please be prepared to show a picture ID** (just a driver's license, student ID, or something similar) at the front desk. Someone from Public Affairs will be at the front desk to sign you in.

### CALENDAR OF EVENTS

#### **PUBLIC INFORMATION MEETING #1**

WHERE: WALTER REED AMC, JOEL AUDITORIUM

WHEN: MAY 11, 1999

WHAT: To introduce the process for declaring the NPSHD to be an excess property

#### **PUBLIC INFORMATION MEETING #2**

WHERE: FOREST GLEN ANNEX, WRAIR AUDITORIUM

WHEN: OCTOBER 28, 1999

WHAT: To discuss the status of the action and the findings of the EA

#### **PUBLIC COMMENT PERIOD**

WHEN: WINTER 1999 (TO BE ANNOUNCED)

WHAT: There will be a formal 30-day public comment period when the final EA is published.

The Army will not initiate the proposed action until this 30-day period has ended, comments have been received, and the views expressed by interested members of the public have been considered.

US Army Corps of Engineers  
ATTN: CENAB-PL-E (Clifford Kidd)  
P.O. Box 1715  
Baltimore, MD 21203-1715

ADDRESS CORRECTION REQUESTED

## Public Information Meeting: October 28, 1999

**ATTENDEES:** Interested members of the community

**COPIES:** Clifford Kidd/CENAB  
Tracy Porter/WRAMC DPW  
Margie Marcus/WRAMC DPW  
Bobby Roberts/MEDCOM

**NOTES BY:** Virginia Farris and Pam James/CH2M HILL

**DATE:** November 15, 1999

The second public information meeting associated with the Environmental Assessment (EA) for excessing the National Park Seminary Historic District was held on October 28, 1999, at 7:00 p.m., in the new Walter Reed Army Institute of Research (WRAIR) Auditorium at the Forest Glen Annex. The meeting was advertised through public notices in the *Washington Post*, the *Washington Times*, and the *Montgomery Journal* that were published on October 21, 1999, and by flyers sent to the mailing list (about 200 individuals and agencies). Excluding Army and General Services Administration (GSA), 26 individuals attended.

Beverly Chidel/WRAMC Public Affairs Officer opened the meeting and described the ceremony that was held at the Japanese Pagoda that morning, in which the Maryland Commission for Celebration 2000 designated the National Park Seminary Historic District as "Treasure of the Month" and honored Save Our Seminary (SOS) for their preservation efforts. Mark Willey/CH2M HILL and Ernest Cooper/GSA Region 4 gave brief presentations to update the community on the Army's nearly-completed Environmental Assessment (EA) for the excessing action and to summarize the GSA's screening and disposal process that will commence shortly after the EA is finalized.

After the presentations, questions were moderated by Mark Willey. The questions and answers provided are summarized in the following pages. Persons who provided answers to specific questions are identified at the end.

Questions	Answers <sup>a</sup>
<b>NEPA Process:</b>	
1. An EA expedites the process of property transfer, but does an EIS allow a greater level of environmental evaluation?	(Mark Willey) Not really. The essential difference between the EA and the EIS process, in this case, is the length [and timing] of the public comment period. An EIS may allow greater public participation. An EA follows the same steps as an EIS, but the time frame is compressed. With each process there is a draft and final document development period. There is no public comment period on a draft EA, but please note that the final draft EA for this project will be available for information at the Silver Spring library next week. There will be a comment period on the Final EA that we will respond to [ <i>before taking the proposed action</i> ].



Questions	Answers <sup>a</sup>
2. A concern in support of an EIS is that the EA has not assessed biological and medical uses at the site since its seizure by eminent domain in 1940. During WWII, uncontrolled Hepatitis C was a major concern everywhere and this facility was used for medical purposes. This is a big concern to the Veterans of Vietnam, enough so that we might elevate this issue.-	(Bobby Roberts) It's true the EA has not assessed old medical uses [1940s to 1970s]. The buildings were later converted to administrative use and were deemed safe for that purpose over the years. For that reason, it seems unnecessary to assess risks from previous medical uses now; it would be a waste of taxpayers' money. Studies were done on the buildings with previous radiological uses.
3. Is it your [GSA's] intent to do an EIS?	(Mark Willey) The NEPA process can be fulfilled at one of three levels: an EIS is the most expansive; an EA is a middle ground; a report of categorical exclusion is the lowest level. Once GSA gets the Army's EA, they can determine what level is necessary. NEPA requirements are cut-and-dry for certain actions. If it is determined that there are no impacts, then it is necessary to show documents that prove no impact.
4. How can you say that there are no impacts if you sell the property to a developer? Why does the Army have to prepare an EA to excess the property?	(Mark Willey) There's a difference between direct and indirect impacts and who is responsible for mitigating them. The Army's EA is a way to keep you informed and to provide an environmental baseline for future owners.
5. In addition to the library copy, I suggest the EA be posted on a Walter Reed or GSA web site for easier access.	(Mark Willey) The current EA is an unsigned draft final. We intend to post the signed, final EA to the WRAMC web site [Note: WRAMC's home page is <a href="http://www.wramc.amedd.army.mil/">http://www.wramc.amedd.army.mil/</a> -- specific page to be announced].  (Ernest Cooper) GSA also will set up a web site for this property in the future.
<b>Contamination:</b>	
6. When the Federal Government conveys property, all of the environmental hazards must be mitigated. But there is an exception, in that known contaminants such as lead-based paints and asbestos do not need to be mitigated. Please address this issue.	(Mark Willey) When the Federal Government transfers property, it identifies existing contaminants at the site. Some contaminants are allowed for transfer "as is" under federal and local regulations. These might include lead-based paint or asbestos. The developer is made aware of and accepts responsibility for corrective actions regarding these contaminants. The developer, in this case, must work with Montgomery County to determine acceptable uses for the property. For instance, putting a childcare center into a facility that has lead-based paint would not be considered compatible.  (Gordon Creed) GSA's policy and practice is not to second-guess the market by doing unnecessary abatement in advance. In consultation with EPA and the Justice Department, our policy is to give our new owner information on what they need to do to bring the property into compliance, based on their reuse plans. Nothing about this is unusual with the Forest Glen property transfer. We have been conducting similar transfers across the country since 1984.
7. Isn't there a cradle-to-grave responsibility?	(Mark Willey) For hazardous substance contamination [note: as defined by CERCLA], the Federal government takes cradle-to-grave responsibility for environmental mitigation. This would apply even after a property

Questions	Answers <sup>a</sup>
	transfer. The Army recognizes this possibility and would be responsible for cleanup if, say, a developer found contaminated soil or groundwater from the underground oil tank in Parcel 3.
8. The Army neglected the property for a number of years, has done some work, and now wants to move on. I salute that, but the years of neglect need to be recognized in this process. What happens if the ultimate user decides on the purpose for the property after the Army lets go of its responsibility?	(Mark Willey) Over the years, the Army was required to follow the same regulations as anyone else for lead-based paint, etc., in the buildings. Most other older buildings also have lead-based paint and asbestos.
<b>Excessing and Disposal Process:</b>	
9. Could you tell me how to contact Ernest Cooper, GSA, to track this project?	Phone numbers and business cards were distributed for Ernest Cooper [404-331-2368] and Phyllis Runci [202-501-3190] of GSA.
10. I have been unable to get information about renting the facility. Is it your intent to abrogate the leases (like VFW, Carroll House shelter)?	(Tracy Porter) Yes; all lessors have been informed about the pending property transfer and the 90-day lease cancellation notice period that can be invoked when the transfer process initiates.
11. In recent past, the Army property was "excessed" and then it was "unexcessed". What's to prevent that happening again under a new commander?	(Bobby Roberts) We weren't as far along in the process back then as we are now. This time, the direction to excess is coming from up above WRAMC's commander. The Assistant Secretary of the Army is backing this initiative, because the Army doesn't have any future use for the Seminary.
12. What is the chance of another [Federal] agency taking over the property?	(Ernest Cooper) Very slim.
13. Will GSA have public meetings?	(Gordon Creed) It's too early to say. GSA will stay involved under the auspices of Montgomery County. We will attend county meetings as requested.
	(Gordon Creed) I would like to bring up a question that has not been asked about the five-step property transfer process -- that is, the possibility of the property's transfer for a public body to use. There is opportunity for things like education, a state police training facility, joint use as a public health center and clinic, or a Montgomery County performing arts center. The County must step forward to request this. Your participation will be very important at this stage of the process.
14. Is it the responsibility of the county? GSA will not organize that?	(Gordon Creed) We will assist and support the county's interests, but at their discretion. We cannot abrogate the role of local government. We'll be there to help, but not to lead.
15. Would GSA consider including our association [Forest Glen Park Citizens Association] in your regular meetings where you are marketing the property? Information from the County is second-hand.	<p>(Gordon Creed) I recommend you contact Ernest Cooper and Phyllis Runci on that issue and use GSA's web site [<i>once it is set up</i>] for all the latest information.</p> <p>(Ernest Cooper ) Normally, GSA works exclusively with the local government until the five screening steps are completed. GSA does not hold meetings, but attends local government meetings as invited. Communication</p>

Questions	Answers <sup>a</sup>
I will request FOIA contact at GSA for copies of this correspondence.	[during screening] is usually via letters.  (Scott Reilly) For every step taken by Montgomery County, as the process moves toward property reuse by a private user, changes must be made to the Master Plan, rezoning, site plan review, etc., and public participation is an integral part of that process. M-NCPPC [MD-National Capital Park and Planning Commission] works with local civic associations.
<b>Section 106:</b>	
16. Can you explain how Section 106 ties into this process?	(Mark Willey) Section 106 is a consultation process with the State Historic Preservation Officer [ <i>that must be completed before the property is transferred</i> ].
17. How can SOS get into it [ <i>negotiating an agreement under Section 106</i> ] as a consulting party?	(Tracy Porter) I have passed along SOS's interest in being involved to the Army Corps of Engineers.
<b>Maintenance:</b>	
18. Because I live so close, I have witnessed the crumbling of the buildings, plaster ceilings collapsed, etc. I do not consider this to be maintenance.  <i>Followup comment by Bonnie Rosenthal, SOS Executive Director:</i> The Army has not made good decisions in the past but, in the last year, Walter Reed has worked more closely with SOS to set priorities and to maintain safety and security at the facility. When plaster falls, it's because leaking roofs are a problem. It's anticipated that in the spring, the Ballroom will be useable again. It is important for the community to let SOS know about safety or security issues regarding the facility—we are the eyes and ears for Walter Reed here, especially since most of the buildings are now vacant.	(Bobby Roberts) Until transfer, we are spending \$400 thousand a year to maintain the property. A priority list has been approved that essentially calls for making the buildings weather-tight. We will not repair major deterioration; if a ceiling collapses it will remain that way.  (Tracy Porter) In 1998, the Army was given \$1 million to repair the property and we did some repairs, but we have not been given any more money since then. Some areas have deteriorated to the point that they have been shut down. Access to the Ballroom is closed by order of the Fire Marshal.  (Mark Willey) The Army has financial restrictions, they can only spend what they're given. I think everyone agrees that the sooner the property transfers to a new owner, the better.
<b>Property Value:</b>	
19. It is my understanding that GSA has hired a contractor who has begun a site appraisal process. Is preliminary information available on the appraisal or other survey instrument? And has this site information inspired interest from developers?	(Mark Willey and Ernest Cooper) GSA has not started the <u>appraisal</u> process yet, but has been conducting market research as part of the excessing process. The market research is looking at issues like whether the 27-acre site should be excessed with or without additional parcels. Developers have been interested, but not because of the market research.
20. I have been around Forest Glen since 1942. I am curious – is it possible that the property would be given away and if it is sold who will get the money?	(Gordon Creed) It is possible that the property could be transferred as an asset grant to an organization, if a formal application is filed with a program of use. The organization would need to show that it could fulfill financial and managerial capabilities. We have excellent slides that we could share of an Asheville, NC situation. On the other hand, if the property transfers under a public sale, the cash would go to the Federal Treasury.
<b>General Comments:</b>	

Questions	Answers <sup>a</sup>
21. I would like to elaborate on today's award to SOS. The award also recognized the Seminary's status as being very endangered.	
22. The Army has stated that they want the process to work and I believe that is true. But I haven't heard enough to convince me that the direction we are headed will best benefit the neighborhood and preserve the buildings – especially since the property may well go to the highest bidder. I prefer the option for an asset grant to the County or a nonprofit. To achieve this we would need some sort of subsidy to make up for the years of Army neglect. Studies prove this to be true. The Army recognized this when they added parcels of land to make up for the difference. I would rather give up Parcel 3 and receive the \$5 million the Army would need to rebuild the warehouse as a subsidy instead, even if it means a Congressional action. SOS is willing to work for this, but it would help if the Army and the county joined forces with us. A developer will build on the flat land first and allow more deterioration to the existing buildings, and will then call for those unsafe buildings to be torn down. This is "Gradual Phased Destruction." You should take the highest bidder option off the table and only allow a local agency or nonprofit.	<p>(Mark Willey) The Army recognized the need to make the package attractive by adding those extra parcels. The "highest bidder" may in fact be a very low amount of money, due to the costs of restoring and developing this property.</p> <p>To get on my soap box on the democratic process here: I would encourage your participation as citizens, realizing the limitations of what government agencies are allowed to do; keep informed, lobby your elected officials.</p>
23. What happened to the Silver Spring Armory is a bad example of historic preservation by local government.	(Mark Willey) We all know the system is not flawless; it's up to citizens to keep an eye on enforcement, too.
24. We've called for attitude change on the part of the Federal government, but I think an attitude change on part of the County is also called for. We want something good for the community and we want it fast. We want the same good leadership for NPS as for Glen Echo; there could be a possibility for a subsidy like Glen Echo received.	<p>(Scott Reilly) We will be working to remove some of the uncertainty for the community and developers, by negotiating a Memorandum of Agreement with all the historic agencies signing on. We're also working with the M-NCPPC to establish thresholds for impact on the community in 3 areas: preservation of the site, protection of the community, and economic viability.</p> <p>(Gordon Creed) You've raised a good issue – working fast – and for that reason we are pre-screening the property [<i>with Federal agencies</i>] prior to the Army's issuing the Report of Excess. GSA and the County plan to work closely in the future.</p>
<p>a. <u>Persons answering questions:</u></p> <p>Ernest Cooper: GSA, Region 4 Property Disposal Division</p> <p>Gordon Creed: GSA, Regional Commissioner</p> <p>Tracy Porter: WRAMC, Chief of Master Planning, Directorate of Public Works (DPW)</p> <p>Scott Reilly: Office of the Montgomery County Executive</p> <p>Bobby Roberts: MEDCOM, Real Property Program Manager</p> <p>Mark Willey: CH2M HILL (EA consultant, facilitator)</p>	

# THE Journal NEWSPAPERS

## PROOF OF PUBLICATION

I, Ryan E. Phillips, Publisher of the MONTGOMERY & PRINCE GEORGE, a newspaper in the County/City of MONTGOMERY & PR. GEORGE published in the English language, and having a bona fide list of paid subscribers located in the aforementioned County/City, and entered as second class matter under the Postal Laws and Regulations of the United States of America for 52 successive weeks or more prior to the issue of 10/21/1999, certify that the notice of INFORMATION MTG 10/28, WALTER REED for CH2M HILL attached hereto has been published in said newspaper 1 times for 1 issues consecutive, commencing with the issue of 10/21/1999.

*Ryan E. Phillips*

RYAN E. PHILLIPS

Sworn to and subscribed before me this 21st day of October, 1999.

*[Signature]*  
My commission expires

**FEB 28 2001**

Ad number: 452620  
End date: 10/21/1999  
10/21/1999, 1x

VIRGINIA FARRIS

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**OCT 26 1999**

**CH2M HILL/WDC**

6408 Edsall Road, Alexandria, Virginia 22312

## PUBLIC INFORMATION MEETING

**Walter Reed  
Army Medical Center  
Forest Glen Annex**

The Department of the Army is in the process of declaring the National Park Seminary Historic District (NPSHD) to be an excess property. This will allow the General Services Administration (GSA) to screen, market and transfer the property to a new owner. The Army will retain ownership until final disposal. As a part of the process, the Army will prepare an Environmental Assessment.

The Army will hold a public information meeting, to update community members about the current status of the federal property disposal process, the Environmental Assessment, and how the public can participate.

The public information meeting will be held at the following time and place:

- **Thursday, October 28, 1999, 7:00 p.m. to 9:00 p.m.**
- **Forest Glen Annex, Walter Reed Army Institute of Research (WRAIR), Building 503 Auditorium, located on Stephen Sitter Avenue near Brookville Road, in Silver Spring, MD. Parking is available in the new WRAIR parking structure, at the corner of Stephen Sitter Avenue and Robert Grant Road.**

All interested persons are encouraged to attend the public meeting. Because WRAIR is a secure research facility, please be prepared to show a picture ID (driver's license, student ID, etc.) at the front desk.

WRAIR Auditorium is wheelchair-accessible. If you require sign-language interpretation or need other special assistance to be able to participate in this meeting, please contact Beverly Chidel, Public Affairs Officer, by **October 25, 1999**, at (202) 782-7177 or e-mail at [beverly.chidel@na.amedd.army.mil](mailto:beverly.chidel@na.amedd.army.mil).

October 21, 1999

O452620

# AFFIDAVIT OF PUBLICATION

AD# 1346997

District Of Columbia, ss.

Personally appeared before me, Karen M Kiersarsky  
a Notary Public in and for the District of Columbia

Lauren Kidder who being duly sworn according  
to law, on oath says that he is an AUTHORIZED AGENT of  
NEWS WORLD COMMUNICATIONS, INC., publisher of

## The Washington Times

published daily, in the City of Washington, District of Columbia,  
and that the advertisement, of which the annexed is a true copy  
was published in said newspaper 1 times(s) on the following dates:

Oct. 21, 1999

at the rate of 6.92 per line.

Total Cost 498.24 Dollars.

Lauren Kidder

Subscribed and sworn to before me

Nov. 17 19 99

[Signature]  
Notary Public

(Seal)

My commission expires \_\_\_\_\_

RECEIVED

NOV 18 1999

CH2M HILL/WDC

**PUBLIC INFORMATION MEETING**  
**WALTER REED ARMY MEDICAL CENTER, FOREST GLEN ANNEX**

The Department of the Army is in the process of declaring the **National Park Seminary Historic District (NPSHD)** to be an excess property. This will allow the General Services Administration (GSA) to screen, market and transfer the property to a new owner. The Army will retain ownership until final disposal. As a part of the process, the Army is preparing an Environmental Assessment.

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NOV 24 1999

CH2M HILL/WDC

PROOF OF PUBLICATION

**The Washington Post**

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Player David well known to me to be Manager, Billing & Verification of The Washington Post, a daily newspaper published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was published in The Washington Post, a daily newspaper, upon the following date at a cost of \$622.38, and was circulated in the Washington metropolitan area.

Published 1 time. Date 10/21/99  
Account 296730

*Player J. David*

Witness my hand and official seal this 2<sup>nd</sup> day of November 1999

My commission expires JENNIFER A. JOHNSON  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
MY COMMISSION EXPIRES: 9/14/03

PUBLIC INFORMATION MEETING

Walter Reed Army Medical Center, Forest Glen Annex

The Department of the Army is in the process of declaring the National Park Seminary Historic District (NPSHD) to be an excess property. This will allow the General Services Administration (GSA) to screen, market and transfer the property to a new owner. The Army will retain ownership until final disposal. As a part of the process, the Army is preparing an Environmental Assessment.

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WRAIR Auditorium is wheelchair-accessible. If you require sign-language

2 Ad # 91655 Name CH2M HILL Size 66 lines  
Class 820' PO # NOTICE Authorized by V. FARRIS Account 296730

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M0014

interpretation or need other special assistance to be able to participate in this meeting, please contact Beverly Chidel, Public Affairs Officer, by October 25, 1999, at (202) 782-7177 or e-mail at [beverly.chidel@na.amedd.army.mil](mailto:beverly.chidel@na.amedd.army.mil).



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*Walter Reed Army Medical Center invites you to a*

# PUBLIC INFORMATION MEETING

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## Purpose of the Meeting

The Department of the Army is beginning the process of declaring the National Park Seminary Historic District (NPSHD) to be an excess property. This will allow the property to be ultimately transferred to a new owner. However, the Army will retain ownership until final disposal.

This meeting will provide community members with information about the process that the Army will follow in order to allow the General Services Administration (GSA) to market the property.

GSA acts as the "real estate broker" for Federal government property. The meeting will introduce the future process that the GSA will follow to screen, market, and transfer the NPSHD to a new owner.

Representatives of the Army and GSA will be available to answer questions from the public about this process.

*continued on page 2*

**Topic:** Update on the status of the National Park Seminary Historic District

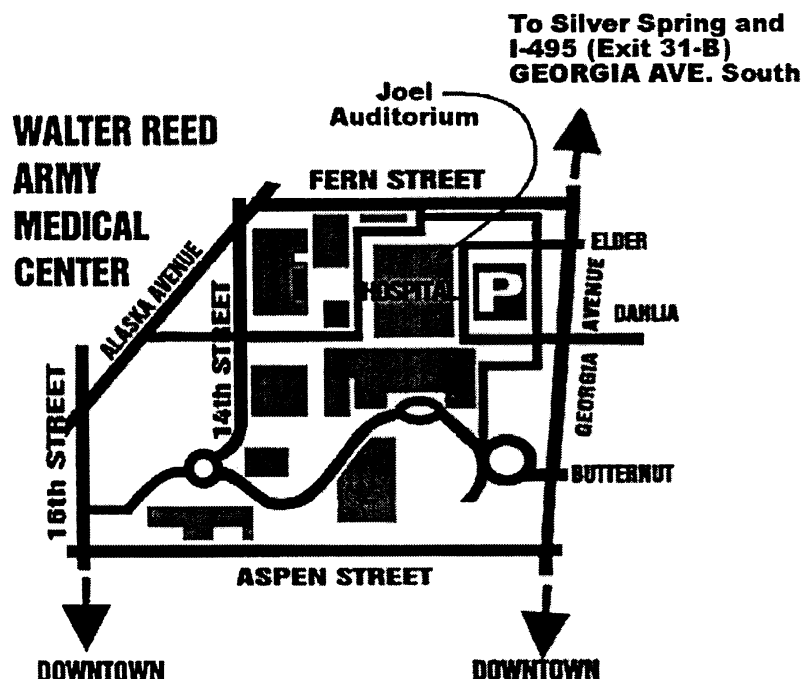
**When:** Tuesday, May 11, 1999  
7:00 p.m. to 9:00 p.m.

**Where:** Joel Auditorium, 2<sup>nd</sup> floor  
Main Hospital (Building 2)  
Walter Reed Army Medical Center  
6900 Georgia Avenue, NW,  
Washington, DC

(See map below)

The Hospital is 2.8 miles south from the Georgia Avenue/Silver Spring exit of I-495. Joel Auditorium is on the Fern Street (north) side, upstairs and to your right as you enter from the garage.

**Parking:** Park in the Hospital garage. From Georgia Avenue, turn onto Elder Street and make an immediate left onto the garage ramp.



## Environmental Assessment (EA)

As a part of the process, the Army will prepare an Environmental Assessment (EA), which will describe the property and examine how the decision to declare it excess could affect the NPSHD and the surrounding area. The meeting will discuss the environmental assessment process and how the public can participate.

The Environmental Impact Statement (EIS) and the related planning process for Army reuse of the NPSHD has been discontinued. Instead, the process to be outlined at this public information meeting will be followed, to provide timely and orderly transfer of the NPSHD under the Federal government's property management laws and regulations.

## For More Information

Please contact **Ben Smith**, Public Affairs Officer

Telephone: (202) 782-7177

E-mail: [ben.smith@na.amedd.army.mil](mailto:ben.smith@na.amedd.army.mil)

Mailing Address:

Mr. Ben Smith  
Attn: MCAT-PA  
Walter Reed Army Medical Center  
6900 Georgia Avenue, N.W.  
Washington, DC 20307-5000

## For Special Assistance

Joel Auditorium is wheelchair-accessible. If you require sign-language interpretation, or need other special assistance to be able to participate in this meeting, **please contact Mr. Ben Smith by May 4, 1999.**

## CALENDAR OF EVENTS

### PUBLIC INFORMATION MEETING

WHERE: WALTER REED AMC, JOEL AUDITORIUM

WHEN: MAY 11, 1999

WHAT: To introduce the process for declaring the NPSHD to be an excess property

### PUBLIC INFORMATION MEETING

WHERE: TO BE ANNOUNCED

WHEN: FALL 1999 (TO BE ANNOUNCED)

WHAT: To discuss the findings of the draft EA

### PUBLIC COMMENT PERIOD

WHEN: WINTER 1999 (TO BE ANNOUNCED)

WHAT: There will be a formal 30-day public comment period on the final EA. The Army will not initiate the proposed action until this 30-day period has ended, comments have been received, and the views expressed by interested members of the public have been considered.

---

US Army Corps of Engineers  
ATTN: CENAB-PL-E (Mr. Clifford Kidd)  
P.O. Box 1715  
Baltimore, MD 21203-1715

ADDRESS CORRECTION REQUESTED

## Public Information Meeting: May 11, 1999

**ATTENDEES:** Interested members of the community

**COPIES:** Clifford Kidd/CENAB  
Tracy Porter/WRAMC DPW  
Bobby Roberts/MEDCOM

**FROM:** Virginia Farris

**DATE:** June 09, 1999

The first public information meeting associated with the Environmental Assessment (EA) for excessing the National Park Seminary Historic District was held on May 11, 1999, at 7:00 p.m., at Walter Reed Army Medical Center (WRAMC), in the Joel Auditorium in Building 2. The meeting was advertised by public notices on May 3, 1999, in the *Washington Post*, the *Washington Times*, and the *Montgomery Journal* and by flyers sent to the mailing list.

Brief presentations were given by Ben Smith/WRAMC PAO, Mark Willey/CH2M HILL, and Ernest Cooper/GSA Region 4, to brief the community on the background of this proposed action, the NEPA process, and the GSA screening and disposal process.

After the presentations, the floor was opened up for questions, which were moderated by Mark Willey. The questions received and answers provided are summarized below. Persons who provided answers to specific questions are listed at the end.

Questions	Answers <sup>1</sup>
<b>NEPA Process:</b>	
Does the NEPA process apply to GSA determination?	Mark Willey: Yes, it does
I have a question about GSA five-step process. Will the public be notified of the progress from one step to the other? Will there be an EIS that the public can comment on?	Gordon Creed: GSA must work closely with local governing bodies; Montgomery County will notify interested citizens. GSA will comply with NEPA, but based on what is known today, there will not be an EIS.
I have a question about the three alternatives. Are they benchmarks or real options?	Mark Willey: Yes, they are the only real options if excessing doesn't go forward.
Understanding that you can't make assumptions about reuse now, what parameters can be set for future options?	Current use, the County's goals, zoning, surrounding land uses
Are there plans for any independent technical reviews of the EA?	No, there is no such provision under federal NEPA regulations. That occurs under California (CEQA) and some other state laws, but not in Maryland.
Why is the Army doing another study when one has already been done?	The NEPA process is required by law; we have to assemble a lot of existing information into one report.

Questions	Answers <sup>1</sup>
<p>The EIS had money budgeted. What happened to that money?</p>	<p>Bobby Roberts: EIS work was stopped; we were able to hold remaining money to restart the EA.</p>
<p><b>Section 106:</b></p>	
<p>I have a question about Step 2 of the GSA disposal process. What does the Section 106 mitigation procedure entail?</p>	<p>Gordon Creed: The Army is working on Section 106 consultation now, for the excessing action, and GSA will work on it later, for disposal. It includes covenants to protect historic properties and will result in an MOA</p>
<p>What is the purpose of Section 106 in the process? Section 106 requires a study to identify adverse effects; does this imply an adverse effect on the historic site?</p>	<p>Tracy Porter: Section 106 compliance means consulting with SHPO and ACHP, to allow them to review the project. Transferring historic properties out of federal ownership is automatically an adverse effect; must be mitigated through an MOA, protective covenants. The consultation process has started; the 1<sup>st</sup> meeting with regulators was held today.</p>
<p><b>Excessing and Disposal Process:</b></p>	
<p>Between the EA and <i>Report of Excess</i>, what will GSA be doing?</p>	<p>Gordon Creed: GSA will be trying to keep pace with Army activities, so we know everything about the property and don't have to start from zero; we may not have a ROE until after the EA is done, but we will have a file of information on the property.</p>
<p>I'm unclear on the excessing process. This is a large, complicated site, some buildings are vacant and some are not. Can the site be subdivided for other uses (for example, low-income housing)?</p>	<p>Gordon Creed: This has been done at larger properties. It's too soon to say here; but probably not, because of the size of the property.</p>
<p>If no federal agency wants the property, is the next step to go to a homeless agency?</p>	<p>Gordon Creed: Once the property is declared surplus to federal needs, there is a checklist for homeless suitability; if the property is found suitable by HUD (most are), an interested homeless provider would have to look at taking the <i>whole</i> property.</p>
<p>If a sale to the public is approved, which congressional committee approves the sale?</p>	<p>There is none. GSA must make an explanatory statement to Congress if the property goes to another agency, via negotiated sale or transfer before getting to the final public sale stage, because that process excludes the public.</p>
<p>During the excessing process, will the public continue to have access to the grounds (for example, artists painting landscape and buildings, spring and fall cleanup, fundraising activities)?</p>	<p>Ben Smith (WRAMC PAO): Yes; there is no reason to change anything we've been doing with public access as long as we still own the property.</p>
<p>A representative from the Latin American Heritage Foundation asked: if several charitable organizations are interested, how do you choose who is qualified?</p>	<p>Gordon Creed: Applications include a "program of use" that is sent to a sponsoring agency (DOI, HHS, etc). GSA tries to work with the County and will ask them to communicate with citizens and to come to GSA with a single application, which could include mixed uses by several entities.</p>
<p>What is a best educated guess on who will be interested in the property?</p>	<p>Gordon Creed: At the beginning, we don't know who is interested. We will be working with the County, the SHPO, etc.; just don't know enough now to say.</p>

Questions	Answers <sup>1</sup>
<p><b>Property Value:</b></p> <p>The cost of maintenance has been a continuing issue. Can you get more money for enhanced maintenance?</p> <p>If the property is sold, where does the money go?</p> <p>What if the property has a negative value? A subsidy would be required. The county government would be reluctant to take on a site and be saddled with redevelopment costs. What if there is no public or private use that is viable? A subsidy is an essential piece. Who is thinking of subsidies?</p> <p>What happens if GSA's overall value on the property is zero or negative because of problems such as lead-based paint and no maintenance?</p> <p>Given that the buildings are historic and unique but in bad shape and have many problems (lead paint, asbestos), how is this property going to be marketed? There might be a financial gap and the property may not make a profit. How is GSA going to take this into account?</p> <p>Despite your best efforts, what if the deal won't work and you won't make a profit? It won't work for the community if the goal is to make money.</p>	<p>Bobby Roberts: Maintenance costs at the NPSHD are a tremendous burden. We can't ask for more money for buildings that have no use.</p> <p>Bobby Roberts: It goes back to the Treasury. The Army will not get any money from the sale.</p> <p>Bobby Roberts: The Army has no mechanism to provide subsidies to developers. The next best option is to provide more land. However, one of those 2 additional parcels contain buildings (salt dome and warehouse) that will have to be replaced. Anything else would require special legislation.</p> <p>Gordon Creed: Most property has at least some value. We have at times found negative value in buildings that are functionally obsolete and on a small lot. "Value" depends on having a dream and the resources.</p> <p>Gordon Creed: GSA has no funds for subsidies to developers. We can dispose of property with asbestos in compliance with the intended use. We may not get as much for the property due to its condition, which is OK.</p> <p>Mark Willey: It's a balancing act. The County has a lot of say in what happens. Asbestos and lead paint are not deal-breakers; there probably aren't any such. Through this process, interested parties will have to decide which buildings are essential and possible to keep. The community needs to keep in touch with their local officials.</p>
<p><b>Miscellaneous:</b></p> <p>How can a contractor qualify to provide maintenance? Is there a prequalification process?</p>	<p>Ed Awni: Maintenance is mostly done in-house. Bigger projects would be advertised in the CBD. It's mostly low-bid; Terry Moen is the contracting officer to contact for more information.</p>
<p><b>General Comment:</b></p> <p>Comment from one attendee to the general audience: No one from the county is here tonight. It shows how much we as the public have to interact with one another.</p>	<p>[Note: One county staff member was present, but left before the meeting ended.]</p>

1. Persons answering questions:

Gordon Creed: GSA, Regional Commissioner  
 Bobby Roberts: MEDCOM, Real Property Program Manager  
 Ben Smith: WRAMC, Public Affairs Officer  
 Mark Willey: CH2M HILL (facilitator)  
 Ed Awni: WRAMC, Acting Director, Directorate of Public Works  
 Tracy Porter: WRAMC, Acting Chief of Master Planning, DPW

# THE Journal NEWSPAPERS

## PROOF OF PUBLICATION

I, Ryan E. Phillips, Publisher of the MONTGOMERY & PRINCE GEORGE, a newspaper in the County/City of MONTGOMERY & PR. GEORGE published in the English language, and having a bona fide list of paid subscribers located in the aforementioned County/City, and entered as second class matter under the Postal Laws and Regulations of the United States of America for 52 successive weeks or more prior to the issue of 05/03/1999, certify that the notice of INFORMATION MTG 5/11, NPSHD for CH2M HILL attached hereto has been published in said newspaper 1 times for 1 issues consecutive, commencing with the issue of 05/03/1999.

*Ryan E. Phillips*

RYAN E. PHILLIPS

Sworn to and subscribed before me this 3rd day of May, 1999.

*[Signature]*  
My commission expires

**FEB 28 2001**

Ad number: 414692  
End date: 05/03/1999  
05/03/1999, 1x

VIRGINIA FARRIS

## PUBLIC INFORMATION MEETING

**For the National Park  
Seminary Historic District**

**Walter Reed  
Army Medical Center  
Forest Glen Annex**

The Department of the Army is beginning the process of declaring the National Park Seminary Historic District (NPSHD) to be an excess property. This will allow the General Services Administration (GSA) to market the property and the property ultimately to be transferred to a new owner. However, the Army will retain ownership until final disposal. As a part of the process, the Army will prepare an Environmental Assessment.

The Army will hold a public information meeting, to provide community members with information about the federal property disposal process that the Army and GSA will follow, the Environmental Assessment, and how the public can participate.

The public information meeting will be held at the following time and place.

• **Tuesday, May 11, 1999, 7:00 p.m. to 9:00 p.m.**

• **Joel Auditorium**, 2nd floor of the Main Hospital (Building 2), at the Walter Reed Army Medical Center, 6900 Georgia Avenue, NW, Washington, DC. Parking is available in the Hospital garage: turn onto Elder Street from Georgia Avenue and make immediate left onto ramp.

All interested persons are encouraged to attend the public meeting. Joel Auditorium is wheelchair-accessible. If you require sign-language interpretation or need other special assistance to be able to participate in this meeting, please inform Ben Smith, Public Affairs Officer, by **May 4, 1999**, at (202) 782-7177 or e-mail at ben.smith@na.amedd.army.mil.

May 3, 1999

O414692

Ad # 108357 Name CH2M HILL Size 98 lines  
Class 820' PO # V. HARRIS Authorized by VIRGINIA F. Account 296730

M0002

PROOF OF PUBLICATION

*The Washington Post*

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Player David well known to me to be Manager, Billing & Verification of The Washington Post, a daily newspaper printed and published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was printed and published in The Washington Post, a daily newspaper, upon the following date at a cost of \$924.14.

Published 1 time. Date 5/03/99  
Account 296730

*Player J. David*  
Witness my hand and official seal this 22<sup>nd</sup> day of June 19 99

*Jennifer A. Johnson*  
JENNIFER A. JOHNSON  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My commission expires 2/16/02  
MY COMMISSION EXPIRES 2/16/02

PUBLIC INFORMATION MEETING

For the National Park Seminary Historic District  
Walter Reed Army Medical Center, Forest Glen Annex

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JUN 24 1999

CH2M HILL/WDC

# AFFIDAVIT OF PUBLICATION

1320549  
AD# #000138815

District Of Columbia, ss.

Personally appeared before me, Barbara C. Terry

a Notary Public in and for the District of Columbia

Golam Arshad who being duly sworn according to law, on oath says that he is an AUTHORIZED AGENT of NEWS WORLD COMMUNICATIONS, INC., publisher of

## The Washington Times

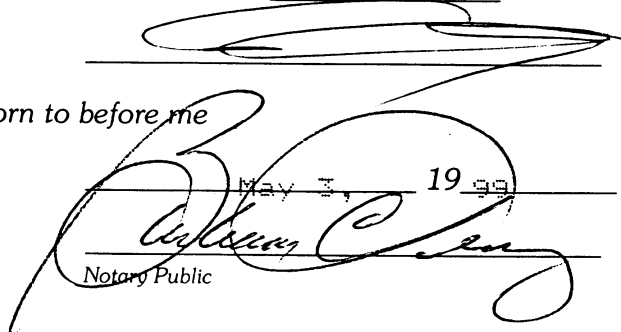
published daily, in the City of Washington, District of Columbia, and that the advertisement, of which the annexed is a true copy was published in said newspaper 1 times(s) on the following dates:

1999 May 3

at the rate of \$ 6.92 per line.

Total Cost \$ 415.20 Dollars.

Subscribed and sworn to before me

  
Notary Public

(Seal)

My commission expires

APR 14 2003

### PUBLIC INFORMATION MEETING For the National Park Seminary Historic District Walter Reed Army Medical Center

**Forest Glen Annex**  
The Department of the Army is beginning the process of declaring the National Park Seminary Historic District (NPSHD) to be an excess property. This will allow the General Services Administration (GSA) to market the property and the property ultimately to be transferred to a new owner. However, the Army will retain ownership until final disposal. As a part of the process, the Army will prepare an Environmental Assessment. The Army will hold a public information meeting to provide community members with information about the federal property disposal process that the Army and GSA will follow, the Environmental Assessment, and how the public can participate. The public information meeting will be held at the following time and place:

• Tuesday, May 11, 1999, 7:00 p.m. to 9:00 p.m.

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MAY 14 1999

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Increased take is also requested due to the revised estimate for the number of fish thought to be available in the estuary in 1999. Modification 6 also authorizes annual takes of juvenile, naturally produced and artificially propagated UCR spring chinook salmon associated with the research. An associated increase in ESA-listed juvenile fish indirect mortalities is also authorized. Modification 6 to permit 946 is valid for the duration of the permit, which expires on December 31, 2000.

Notice was published on April 21, 1999 (64 FR 19515), that FPC applied for a modification to scientific research permit 1193. Modification 1 to permit 1193 was issued on December 22, 1999, and authorizes an increase in annual takes of juvenile, naturally produced and artificially propagated SnR spring/summer chinook salmon associated with FPC's Smolt Monitoring Program. The increased annual take is needed because a larger than anticipated outmigration run is estimated in 1999. An associated increase in ESA-listed juvenile fish indirect mortalities is also authorized. Also for modification 1, FPC is authorized annual takes of juvenile, naturally produced and artificially propagated UCR spring chinook salmon. Modification 1 to permit 1193 is valid for the duration of the permit, which expires on December 31, 2003.

Notice was published on June 24, 1999 (64 FR 33827), that NWFSC applied for a modification to scientific research permit 1213. Modification 1 to permit 1213 was issued on December 22, 1999, and authorizes NWFSC an increased take of juvenile SnR sockeye salmon, juvenile, naturally produced and artificially propagated SnR spring/summer chinook salmon; juvenile SnR fall chinook salmon; and juvenile, naturally produced and artificially propagated UCR steelhead associated with additional testing at McNary Dam under study 4. Modification 1 also authorizes NWFSC takes of juvenile, naturally produced and artificially propagated UCR spring chinook salmon associated with the research. An associated mortality of juvenile, naturally produced and artificially propagated UCR spring chinook salmon is also authorized. Modification 1 to permit 1213 is valid for the duration of the permit, which expires on December 31, 2000.

Dated: January 7, 2000.

**Wanda L. Cain,**

*Chief, Endangered Species Division, Office of Protected Resources, National Marine Fisheries Service.*

[FR Doc. 00-952 Filed 1-13-00; 8:45 am]

**BILLING CODE 3510-22-F**

## DEPARTMENT OF COMMERCE

### National Oceanic and Atmospheric Administration

[I.D. 121599B]

#### Marine Mammals; File No. 782-1532-00

**AGENCY:** National Marine Fisheries Service (NMFS), National Oceanic and Atmospheric Administration (NOAA), Commerce.

**ACTION:** Issuance of permit.

**SUMMARY:** Notice is hereby given that the National Marine Mammal Laboratory (NMML), National Marine Fisheries Service, NOAA, 7600 Sand Point Way, NE, BIN C15700, Bldg. 1, Seattle, WA 98115-0070 [PI: Dr. Thomas Loughlin] has been issued a permit to take Steller sea lions (*Eumetopias jubatus*), Northern fur seals (*Callorhinus ursinus*), and harbor seals (*Phoca vitulina richardsi*) and for purposes of scientific research.

**ADDRESSES:** The permit and related documents are available for review upon written request or by appointment in the following office(s):

Permits and Documentation Division, Office of Protected Resources, NMFS, 1315 East-West Highway, Room 13705, Silver Spring, MD 20910 (301/713-2289);

**FOR FURTHER INFORMATION CONTACT:** Ruth Johnson, 301/713-2289.

**SUPPLEMENTARY INFORMATION:** On November 2, 1999, notice was published in the **Federal Register** (64 FR 59163) that a request for a scientific research permit to take had been submitted by the above-named organization. The requested permit has been issued under the authority of the Marine Mammal Protection Act of 1972, as amended (16 U.S.C. 1361 *et seq.*), the Regulations Governing the Taking and Importing of Marine Mammals (50 CFR part 216), the Endangered Species Act of 1973, as amended (ESA; 16 U.S.C. 1531 *et seq.*), the regulations governing the taking, importing, and exporting of endangered and threatened species (50 CFR parts 222-226), and the Fur Seal Act of 1966, as amended (16 U.S.C. 1151 *et seq.*).

Issuance of this permit, as required by the ESA, was based on a finding that such permit (1) was applied for in good

faith, (2) will not operate to the disadvantage of the endangered species which is the subject of this permit, and (3) is consistent with the purposes and policies set forth in section 2 of the ESA.

Dated: January 10, 2000.

**Ann D. Terbush,**

*Chief, Permits and Documentation Division, Office of Protected Resources, National Marine Fisheries Service.*

[FR Doc. 00-955 Filed 1-13-00; 8:45 am]

**BILLING CODE 3510-22-F**

## DEPARTMENT OF DEFENSE

### Department of the Army

#### Notice of Intent to Prepare an Environmental Assessment for the National Park Seminary Historic District, Forest Glen Annex, Walter Reed Army Medical Center

**AGENCY:** Department of the Army, DoD.

**ACTION:** Notice of intent.

**SUMMARY:** On June 3, 1997, the Army published a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the reuse of the National Park Seminary Historic District (NPSHD). A public scoping meeting was held on July 14, 1997. The proposed EIS was intended to analyze a broad range of Army reuse alternatives for the site; however, the Army no longer needs to use the NPSHD site and now proposes to declare the property excess. Under the Federal Property and Administrative Services Act and its accompanying regulations, the General Services Administration (GSA) is responsible for the disposal of excess federal property. The Army's proposed excessing action will begin the disposal process by providing notice to GSA that the property is excess to the Army's needs.

Therefore, the Army proposes to report the property as excess to GSA, in accordance with Army Regulation 405-90 ("Disposal of Real Estate," dated May 10, 1985) and federal property law. Accordingly, this notice is to inform the public that the EIS for Army reuse of the NPSHD has been discontinued and that the Army is now preparing an Environmental Assessment (EA) for the proposed excessing action. Should the property be declared excess by the Army, then GSA (as the property disposal agent) will be responsible for evaluating the potential environmental impacts associated with disposal and reuse.

**ADDRESSES:** Address comments to Ms. Beverly Chidel, Public Affairs Office, Walter Reed Medical Center, 6825 16th

Street, NW, Washington, DC 20307–5001.

**FOR FURTHER INFORMATION CONTACT:** Beverly Chidel, Public Affairs Officer, at (202) 782–7177 or [beverly.chidel@na.amedd.army.mil](mailto:beverly.chidel@na.amedd.army.mil).

**SUPPLEMENTARY INFORMATION:** The purpose of the EA is to identify the environmental impacts that could be associated with the proposed excessing action and to ensure that the Army makes an informed decision based on full and informed public participation. An EA, rather than an EIS, normally is prepared for proposals that may lead to excessing Army real property (Army Regulation (AR) 200–2, Section 5–3, “Environmental Effects of Army Actions,” dated December 23, 1988). In accordance with the National Environmental Policy Act, the regulations published by the Council on Environmental Quality (Title 40 CFR parts 1500–1508) and AR 200–2, the EA will identify all relevant direct, indirect, and cumulative environmental impacts associated with the proposed action and alternatives.

The NPSHD is part of the Walter Reed Army Medical Center’s Forest Glen Annex, which is located in the Silver Spring area of Montgomery County, Maryland, approximately 1.5 miles north of the District of Columbia. The NPSHD has been listed as an historic district on the National Register of Historic Places since 1972 and was the first historic district to be designated by Montgomery County in 1979. As a result of consolidation and replacement of outmoded facilities, Walter Reed Army Medical Center’s mission-related activities have been relocated and the historic buildings on this property now are mostly vacant.

The EA will address a series of alternatives for the immediate future of the NPSHD. Alternatives may include: Excessing (declaring the NPSHD to be an excess property, which would allow the disposal process to begin); the no-action alternative (retaining the property indefinitely in its current underutilized condition); or “mothballing” the historic buildings and retaining the property. As part of the excessing alternative, the EA will address measures for interim maintenance of the historic buildings, pending their ultimate disposal.

Because GSA is responsible for screening and marketing the property for disposal and reuse, consideration of specific reuse alternatives is beyond the scope of the Army’s EA. Therefore, the EA will be limited to the Army’s proposed excessing action and alternatives, as described above, and

will evaluate the potential environmental effects of disposal and reuse only as indirect and cumulative effects of the Army’s excessing action.

As noted, if the property is declared excess, GSA will market and dispose of the NPSHD and will consider any relevant disposal alternatives and their potential impacts, in compliance with the requirements of the National Environmental Policy Act, as a part of its subsequent disposal action. Public comments are welcome at any time during preparation of the EA. Public information meetings were held (May 11 and Oct. 28, 1999), while the EA was being prepared and were announced in the “Washington Post,” the “Washington Times,” and the “Montgomery Journal” newspapers. Copies of the EA will be made available for public review and a public notice will be published in these same newspapers to advise the public of the availability of the EA.

Dated: January 10, 2000.

**Raymond J. Fatz,**

*Deputy Assistant Secretary of the Army (Environment, Safety, and Occupational Health) OASA (I&E).*

[FR Doc. 00–913 Filed 1–13–00; 8:45 am]

**BILLING CODE 3710–08–M**

## DEPARTMENT OF ENERGY

### Office of Science Financial Assistance Program Notice 00–10; Human Genome Program—Ethical, Legal, and Social Implications

**AGENCY:** Department of Energy.

**ACTION:** Notice inviting grant applications.

**SUMMARY:** The Office of Biological and Environmental Research (OBER) of the Office of Science (SC), U.S. Department of Energy (DOE), hereby announces its interest in receiving applications in support of the Ethical, Legal, and Social Implications (ELSI) subprogram of the Human Genome Program (HGP). Applications should focus on issues of (1) genetics and the workplace, (2) storage of genetic information and tissue samples, (3) education, or (4) complex or multigenic traits. The HGP is a coordinated, multidisciplinary, directed research effort aimed at obtaining a detailed understanding of the human genome at the molecular level. This particular research notice invites research grants that address ethical, legal, and social implications from the use of information and knowledge resulting from the HGP.

**DATES:** Potential applicants are strongly encouraged to submit a brief

preapplication. All preapplications, referencing Program Notice 00–10, should be received by 4:30 p.m., E.S.T., February 17, 2000. Early submissions are encouraged. A response discussing the potential program relevance and encouraging or discouraging a formal application generally will be communicated within 20 days of receipt.

Formal applications submitted in response to this notice must be received by 4:30 p.m., E.D.T., April 6, 2000, to be accepted for merit review and to permit timely consideration for award in Fiscal Year 2000.

**ADDRESSES:** Preapplications, referencing Program Notice 00–10, should be sent to: Dr. Daniel W. Drell, Office of Biological and Environmental Research, SC–72, 19901 Germantown Road, Germantown, MD 20874–1290.

Formal applications, referencing Program Notice 00–10, should be forwarded to: U.S. Department of Energy, Office of Science, Grants and Contracts Division, SC–64, 19901 Germantown Road, Germantown, MD 20874–1290, ATTN: Program Notice 00–10. This address also must be used when submitting applications by U.S. Postal Service Express Mail, or any commercial mail delivery service, or when hand carried by the applicant. An original and seven copies of the application must be submitted.

**FOR FURTHER INFORMATION CONTACT:** Dr. Daniel W. Drell, Office of Biological and Environmental Research, SC–72, Office of Science, U.S. Department of Energy, 19901 Germantown Road, Germantown, MD 20874–1290, telephone: (301) 903–6488 or E-mail:

[daniel.drell@science.doe.gov](mailto:daniel.drell@science.doe.gov). The full text of Program Notice 00–10 is available via the Internet using the following web site address: <http://www.sc.doe.gov/production/grants/grants.html>.

**SUPPLEMENTARY INFORMATION:** The DOE encourages the submission of applications that will address, analyze, or anticipate ELSI issues associated with human genome research in four broad areas:

#### I. Genetics and the Workplace

Research is encouraged on the uses, impacts, implications of, and privacy of genetic information in the workplace. A particular emphasis of this solicitation is screening and monitoring programs that involve the collection and evaluation of genetic information. Research is also encouraged on the use of the workplace as a research venue. Research could explore historical experiences, current practices,

## **1999 Agency Coordination**



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

AUG 23 1999

Ms. Beverly Chidel  
Acting Public Affairs Officer  
Walter Reed Army Medical Center  
ATTN: MCAT-PA  
6825 16th Street, NW  
Washington, DC 20307-5000

Re: Environmental Assessment for National Park Seminary Historic District, Forest Glen Annex,  
Walter Reed Army Medical Center

Dear Ms. Chidel:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) is responding to your request for comments on the referenced project. It is EPA's understanding that the Department of the Army (Army) proposes to report the National Park Seminary Historic District (NPSHD) as an excess property to the General Services Administration (GSA). The Army also proposes to prepare an Environmental Assessment (EA), in accordance with NEPA, to evaluate the environmental impacts of the Army's proposed action of declaring the site excess. The Army states that if the site is declared excess, "...then GSA, as a property disposal agent, will be responsible for evaluating the potential environmental impacts of disposal and reuse, in a separate NEPA document." To aid the Army in its preparation of the EA which will address the action of excessing the NPSHD, EPA offers the following comments.

- The environmental conditions of the NPSHD site should be clearly stated to ensure that the area is in accordance with CERCLA §120(h) and thus suitable for transfer. CERCLA §120(h) focuses on the history and condition of the property and requires Federal agencies to take all necessary actions to protect human health and the environment (with respect to remaining hazardous substances) prior to property transfer. If future cleanup is necessary, the Federal agency must perform the additional cleanup.

- EPA also suggests early coordination with the District of Columbia State Historic Preservation Office (SHPO) to discuss the Army's plan to excess the NPSHD. The EA should also provide a discussion of mitigative measures to address potentially adverse impacts to the historical district as discussed with the SHPO.

Thank you for the opportunity to participate in this early coordination effort of the scoping process. We look forward to receiving the draft EA. If you would like to discuss these comments further, do not hesitate to call Karen Del Grosso, the staff contact for this project, at 215-814-2765.

Sincerely,

A handwritten signature in black ink, appearing to read "John D. Forren", with a stylized flourish extending to the right.

John D. Forren  
NEPA/404 Program Manager

cc: Stephen Richards, GSA



DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS

Douglas M. Duncan  
*County Executive*

Elizabeth B. Davison  
*Director*

August 20, 1999

Ms. Beverly Chidel  
Acting Public Affairs Officer  
Walter Reed Army Medical Center  
ATTN: MCAT-PA  
6825 16<sup>th</sup> Street, NW  
Washington, DC 20307-5000

Dear Ms. Chidel:

In response to your memorandum requesting scoping comments and suggestions on the Army's proposed action of excessing the National Park Seminary Historic District (NPSHD) at Forest Glen, Maryland, Montgomery County offers the following suggestions:

- The Environmental Assessment (EA) should clearly state the boundaries of the property to be excessed, including any property outside of the NPSHD which may be offered for sale to enhance the economic viability of reuse of the site.
- Evaluation of the historic resources on the site by the State Historic Preservation Office (SHPO) and local historic preservation groups, including the Historic Preservation staff of the Maryland-National Capital Part and Planning Commission and Save Our Seminary, should begin immediately. The conditions and covenants on the preservation or restoration of historic resources on the site are one of the most important factors in assessing the reuse options of the site.

Thank you for the opportunity to comment on this initial step in the disposition process of this important site.

Sincerely,

Elizabeth B. Davison  
Director

EBD:jgs



801 Pennsylvania Avenue, NW  
Suite 301  
Washington, DC 20576  
tel 202 482-7200  
fax 202 482-7272  
[www.ncpc.gov](http://www.ncpc.gov)

**Commission Members**

Appointed by the  
President of the United States  
Harvey B. Gantt, Chairman  
Robert A. Gaines  
Margaret G. Vanderhye

Appointed by the Mayor of the  
District of Columbia  
Arrington Dixon  
Dr. Patricia Elwood

Secretary of Defense  
The Honorable William S. Cohen

Secretary of the Interior  
The Honorable Bruce Babbitt

Administrator of General Services  
The Honorable David J. Barram

Chairman, Committee on  
Governmental Affairs  
United States Senate  
The Honorable Fred Thompson

Chairman, Committee on  
Government Reform  
U.S. House of Representatives  
The Honorable Dan Burton

Mayor, District of Columbia  
The Honorable Anthony A. Williams

Chairman, Council of the  
District of Columbia  
The Honorable Linda W. Cropp

**Executive Director**

Reginald W. Griffith

IN REPLY REFER TO:  
NCPC File No. 5758/1200

AUG 12 1999

Ms. Beverly Chidel  
Acting Public Affairs Officer  
Department of the Army  
Walter Reed Army Medical Center  
ATTN: MCAT-PA  
6825 16<sup>th</sup> Street, NW  
Washington, D.C. 20307-5000

Dear Ms. Chidel:

Thank you for the letter of August 3, 1999 requesting comments regarding the scoping information for the proposed Environmental Assessment (EA) for excessing the 27-acre National Park Seminary Historic District at the Forest Glen Annex of the Walter Reed Army Medical Center in Montgomery County, Maryland. We hope our comments will assist you in preparing the EA and its potential resulting Finding. These comments on the scoping information for the EA are limited to the Commission's role as the central planning agency for the federal government in the National Capital Region and only express our general views on planning and environmental issues.

The Commission staff notes that the proposed EA should address the following issues:

**National Capital Comprehensive Plan**

- Given that the project is a federal effort in the region, a comparison of the excessing plan and any potential anticipated future-use plans with the goals and objectives of several elements of the National Capital Comprehensive Plan should be identified and discussed. These would include location criteria, federal planning policies, federal transportation policies, and historic preservation policies under the various federal elements of the plan.

### Stormwater Management

- Potential development at former federal facilities within the Montgomery County area should be planned to allow for an adequate balance between constructed impervious areas and open space for adequate stormwater run-off and retention. Site development should utilize best management procedures/practices to reduce the amount of cut and fill and disturbance within natural drainage areas. Existing sub-surface aquifers should be identified in the planning process and accommodated with the objective toward restoring the site hydrologic regime. Striving toward this goal helps to mimic the natural or predevelopment condition, thereby maintaining surface water and groundwater quality, and minimizing the generation and off-site transport of pollutants.

### Forest Corridors and Buffers

- The landscape and park-like open space setting of the Historic District that is provided by trees and natural buffers should be protected and enhanced. The natural wooded buffer areas, which also serve to separate individual structure sites, act as natural barriers, and should be maintained. Additional wooded buffers should also be included to physically augment development. Care should be taken to maintain large preserves of wooded site area and natural greenery as part of future development. Abundant and well-maintained groves of trees provide shade and mitigate building development and surface paving. They also reduce effects of heat and wind conditions and provide a positive setting for development. Trees where necessary should be introduced into natural buffer areas and areas between facilities where strong screening effects are required. Tree masses and building forms should be related and reflect the overall design setting of the area. Existing tree-lined vehicular corridors should be maintained and enhanced.
- The small intermittent streamside and drainage area forest on the site functions as a critical element when it provides energy to streams in the form of dissolved carbon compounds and organic detritus. These materials are important to processes within the overall watershed itself. In small, well-shaded upland streams, as much as 75% of the organic food base may be supplied by dissolved organic compounds or detritus such as fruit, limbs, leaves and insects that fall from the forest canopy. Associated benthic detritivores within nearby watercourses (the stream bottom bacteria, fungi and invertebrates that feed on the detritus) form the basis of the aquatic food chain. Thus the onsite wooded areas functions as an important energy source for the entire watershed associated with the Potomac River.



Ms. Beverly Chidel  
Page 3

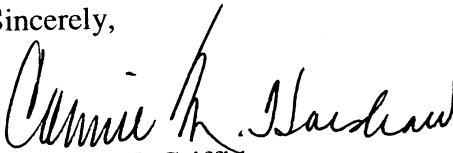
Simple removal of nonpoint pollutants is not enough to improve the quality of water resources. A balanced, integrated, adaptive community of riparian and aquatic organisms comparable to the natural systems of the region with stability and capacity for self-repair must be reestablished. The restoration of a healthy aquatic ecosystem from the headwaters to the Chesapeake Bay is dependent upon the reestablishment of significant amounts of riparian forest. Control of nonpoint pollutants and repair of the aquatic ecosystem through reestablishment of the streamside forest is a logical next step in improving the quality of the water resources of the National Park Seminary Historic District.

#### Historic Attributes and Potential Feasibility for Use

- Issues and attributes of the parcel's historic qualities and potentials should be considered and identified in the EA. Furthermore, an analysis of pertinent studies would be valuable in the document. As mentioned in our August 7, 1997 correspondence, the 1973 National Park Seminary Site Preservation Feasibility Study conducted by this Commission, the Walter Reed Army Medical Center, the Maryland-National Capital Park and Planning Commission, and the Maryland Historic Trust and others contains worthwhile objectives.

We appreciate your consideration of our comments and your consultation with us at this stage of the EA planning. If you have any questions about our comments, please contact Nancy Witherell of my staff at (202) 482-7239, who will coordinate this agency's review of the historic property, or Eugene Keller at (202) 482-7251, our Environmental Officer.

Sincerely,

  
for Reginald W. Griffith  
Executive Director

PARRIS N. GLENDENING, *Governor*  
HENRY A. VIRTIS, D.V.M., *Secretary*  
HAGNER R. MISTER, *Deputy Secretary*



The Wayne A. Cawley, Jr. Building  
50 HARRY S. TRUMAN PARKWAY  
ANNAPOLIS, MARYLAND 21401  
Baltimore/Annapolis (410) 841-5700  
Washington (301) 261-8106  
Facsimile (410) 841-5914  
MD Relay 1-800-735-2258  
Internet: <http://www.mda.state.md.us>

STATE OF MARYLAND  
DEPARTMENT OF AGRICULTURE

September 2, 1999

RECEIVED

Ms. Beverly Chidel  
Acting Public Affairs Officer  
Walter Reed Army Medical Center  
ATTN: MCAT-PA  
6825 16<sup>th</sup> Street, NW  
Washington, DC 20307-5000

OCT 14 1999

CH2M HILL/WDC

**RE: *Environmental Assessment for National Park Seminary Historic District,  
Forest Glen Annex, Walter Reed Army Medical Center***

Dear Ms. Chidel:

Thank you for the opportunity to review the above-referenced proposal. The Maryland Department of Agriculture has no comments.

If you have any questions or should need additional information, do not hesitate to call my office at 410/841-5880.

Sincerely,

A handwritten signature in black ink, appearing to read "H. A. Virts".

Henry A. Virts, D.V.M.  
Secretary

HAV:mej



General Services Administration  
Southeast Sunbelt Region  
401 West Peachtree Street  
Atlanta, GA 30365-2550

August 24, 1999

Mr. Clifford J. Kidd  
Planning Division  
Baltimore District,  
U. S. Corps of Engineers  
P. O. Box 1715  
Baltimore, MD 21203-1715

Re: National Historic District  
Forest Glen Annex  
Silver Springs, MD  
GSA Control No.: 4-D-MD-558-B

Dear Mr. Kidd:

This letter confirms our telephone conversation of August 5, 1999, concerning comments being received from Reviewers of the Draft Environmental Assessment on the referenced property. Several reviewers expressed concerns about the Corps of Engineers committing the General Services Administration (GSA) to negotiating covenants with the State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation (ACHP) and the Army.

In disposing of properties, GSA routinely negotiates covenants, if required, for historic properties with the SHPO to comply with Section 106 of the National Historic Preservation Act. When we explain our disposal process on historic properties, we inform the public that protective covenants will be included in the transfer document when the property transfers from Federal to private ownership. These covenants are there to protect the integrity of the property and the new owner as well as afford GSA the opportunity to maximize its market exposure of the property. If covenants are determined necessary to protect certain elements of properties GSA will work with the landholding agency, SHPO, etc, to ensure that such covenants are included in the offer to purchase and included in the deed.

The following is a response to the comments received from the reviewers regarding Forest Glen Annex:

(1) It is our position that once covenants, if required, are agreed upon between GSA, SHPO, the Army and the ACHP, these covenants transfer with the property. The end user may at its



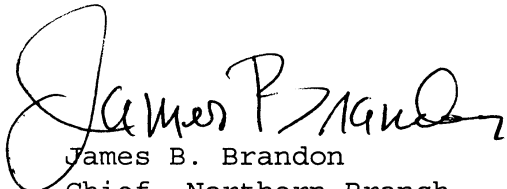
option petition the ACHP to have the covenants removed as being too restrictive. This approach is displayed in the invitation to bid and subsequently, shared with the high bidder for the property.

(2) Again, covenants, if required, are agreed upon between GSA and the SHPO. At this point in the disposition of the property, it is not our discretion that rules. The covenants agreed on must transfer with the property.

(3) We believe the property is marketable (as agreed upon) which could provide tax incentives for a possible user along with the potential future use of the property. A subsequent owner of the property could always at a later date petition the ACHP, SHPO, GSA and the Army to mitigate the covenants.

If you should have further questions, please call Ernest Cooper at (404) 331-2368.

Sincerely,

A handwritten signature in dark ink, appearing to read "James B. Brandon". The signature is fluid and cursive, with a large initial "J" and a long, sweeping underline.

James B. Brandon  
Chief, Northern Branch  
Property Disposal Division



DEPARTMENT OF THE ARMY  
WALTER REED ARMY MEDICAL CENTER  
WASHINGTON, DC 20307-5001

REPLY TO  
ATTENTION OF:

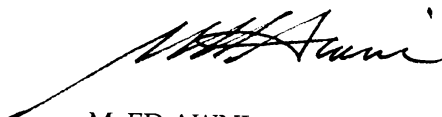
WRAMC MCAT-DPW

29 July 1999

MEMORANDUM FOR: See Distribution List (enclosed)

SUBJECT: Environmental Assessment for National Park Seminary Historic District, Forest Glen Annex, Walter Reed Army Medical Center

1. The Department of the Army proposes to report the National Park Seminary Historic District (NPSHD) as an excess property to the General Services Administration (GSA). Under the Federal Property and Administrative Services Act (FPASA) and its accompanying regulations, the GSA is responsible for the disposal of excess federal property. The Army's proposed action will begin the disposal process by providing notice to GSA that the property is excess to the Army's needs.
2. The NPSHD is an approximately 27-acre parcel that is part of the Walter Reed Army Medical Center's Forest Glen Annex, located in the Silver Spring area of Montgomery County, Maryland. (See attached map.) It has been listed on the National Register of Historic Places since 1972.
3. The Army is preparing an Environmental Assessment (EA), in accordance with the National Environmental Policy Act (NEPA) and its implementing regulations. The Army's EA will evaluate the potential environmental impacts of the Army's proposed action of declaring the NPSHD excess. If the NPSHD is declared excess, then GSA – as the property disposal agent – will be responsible for evaluating the potential environmental impacts of disposal and reuse, in a separate NEPA document.
4. In 1997, WRAMC contacted your organization to request scoping comments on an EIS for Army reuse of the NPSHD. Because the Army's proposed action has changed substantially, that EIS has been discontinued. Your reply (if any) to that previous request is enclosed for your reference.
5. At this time, we are asking for any additional scoping comments or suggestions you may have on the Army's current proposed action of excessing the NPSHD and preparation of this EA. It would be most helpful for the preparation of the draft EA if you could respond by **August 24, 1999**.
6. Please forward your comments in writing to: Ms. Beverly Chidel, Acting Public Affairs Officer, Walter Reed Army Medical Center, ATTN: MCAT-PA, 6825 16<sup>th</sup> Street, NW, Washington, DC 20307-5000.

  
M. ED AWNI  
Acting Director

Directorate, Public Works

Encls

CF: WRAMC Garrison Commander (COL Brown)  
MEDCOM (LTC Sullivan)  
CENAB-PL-E (Carol Bernstein)

## DISTRIBUTION LIST

✓ = Copy of 1997 scoping comment response is enclosed

### Federal

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(ATTN: Keith Tobias)  
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Honorable Barbara A. Mikulski  
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✓ Ms. Diana Esher  
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✓ Mr. Don L. Klima  
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1100 Pennsylvania Avenue, N.W.  
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Mr. Ernest Cooper, Jr.  
Property Disposal Division (4PR)  
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Mr. Richard Butterworth  
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### State

✓ Mr. William Carroll  
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Honorable Parris N. Glendening  
Governor, State of Maryland  
State House  
Annapolis, MD 21401-1955

Honorable Christopher Van Hollen  
Senator, District 18  
Maryland General Assembly  
James Senate Office Building, Room 304  
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Annapolis, MD 21401-1991

✓ Honorable Jane T. Nishida  
Secretary  
Maryland Department of the Environment  
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Baltimore, MD 21224

✓ Andrew T. Der  
Acting Chief, Southern Division  
Nontidal Wetlands and Waterways Division  
Water Management Administration  
Maryland Department of the Environment  
Baltimore, MD 21224

✓ Mr. Michael Slattery  
Director, Wildlife & Heritage Division  
(ATTN: Ms. Laurie Byrne, Wildlife Div. E-1)  
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Tawes State Office Building  
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Annapolis, MD 21401

Honorable Patricia Payne  
Secretary  
Maryland Department of Housing & Community Dev.  
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Crownsville, MD 21302-2023

Honorable Lewis R. Riley  
Secretary  
Maryland Department of Agriculture  
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Honorable Leon G. Billings  
Delegate, District 18  
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Chairman  
Maryland Environmental Trust  
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Crownsville, MD 21032-2023

✓ Ms. Lauren Bowlin  
Maryland Historical Trust  
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Local/Regional

Honorable Derick Berlage  
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Honorable Douglas M. Duncan  
Montgomery County Executive  
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✓ Mr. William H. Hussmann  
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Montgomery County Planning Board  
MD-National Capital Parks & Planning  
Commission  
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Chief, Div. of Facilities & Services  
Montgomery County Dept. of Public Works &  
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Ms. Elizabeth Davison  
Director  
Montgomery County Dept. of Housing &  
Community Affairs  
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Rockville, MD 20850

Ms. Ruth R. Crone  
Executive Director  
Metropolitan Washington Council of  
Governments  
777 North Capitol Street, N.E.  
Washington, DC 20002-4201

✓ Mr. Reginald W. Griffith  
Executive Director  
National Capital Planning Commission  
801 Pennsylvania Avenue, N.W.  
Suite 301  
Washington, DC 20576

**Local Agencies Meeting: October 28, 1999**

ATTENDEES: See Attachment 1

COPIES TO: Clifford Kidd/CENAB-PL Tracy Porter/WRAMC DPW  
Margie Marcus/WRAMC DPW Bobby Roberts/MEDCOM

NOTES BY: Virginia Farris and Pam James/CH2M HILL

DATE: November 9, 1999

The third meeting between various Army organizations and representatives of interested local agencies was held on October 28, 1999, in the conference room in the WRAIR construction project office (Building 172) at Forest Glen Annex. The list of persons in attendance and the meeting agenda are provided as Attachments 1 and 2.

Bobby Roberts, US Army Medical Command (MEDCOM) Real Property Program Manager, convened the meeting at 10:15 a.m.

**1. US Army update**

Bobby Roberts updated the group on the Army's progress with the excessing action and the Environmental Assessment (EA). The Army's internal (WRAMC and MEDCOM) Draft Report of Excess (ROE) to the Army Corps of Engineers (COE) this fall was delayed, to allow General Services Administration (GSA) to complete a market survey analysis; this was requested to clarify whether we need to excess two extra parcels to make the NPSHD more attractive for a potential sale. Current schedule calls for the market survey analysis to be delivered to GSA by their contractor on November 2. After the internal ROE is delivered to the COE, they will prepare the SF 118 (formal ROE) for the GSA. Once the draft ROE is done, however, GSA can begin some preliminary screening actions, maybe by mid-November.

In response to a question about the schedule, Bobby Roberts noted that the COE must notify Congress a minimum of 60 days before the property is transferred; COE uses the draft internal ROE to do that. The Final ROE is expected in February 2000, when it will be staffed through several levels – legal, real estate, environmental - at MEDCOM, COE (Chief of Engineers), and ACSIM (HQDA); it will probably take another two months before the SF118 is formally transmitted to GSA, or about April 2000.

The EA's preferred alternative has changed from previous drafts: pending the GSA market survey analysis, the preferred alternative is to excess two additional parcels along with the NPSHD. The unsigned final EA is complete and has been submitted for approval and signature. Each local agency present was invited to take a copy; those not present were subsequently mailed a copy (see Attachment 3). This is not the final EA for public and agency review; we expect there will be some minor changes but the final version should be



substantially unchanged. A copy of the unsigned, final EA will be placed at the Silver Spring Library soon, for the public to get an advance look at it.

The Department of the Army has decided we must publish a Notice of Availability (NOA) of the EA and Finding of No Significant Impact (FNSI) in the Federal Register, as well as in local newspapers, which could delay the final publication of the EA somewhat. Once the NOA is published, a 30-day public comment period starts on the signed final (hopefully in mid-December). One goal for tonight's meeting is to let the public know that the unsigned final EA is available for an advance look, prior to the published final and the public comment period.

## 2. GSA update

Ernest Cooper noted that the Market Analysis Survey was requested by MEDCOM (Colonel Sullivan/legal counsel). The reason is that the Army still needs the salt dome and warehouse on one of the two additional parcels. He then reviewed the GSA property disposal process again:

- i. **Report of Excess:** An agency (Army) reports property excess to GSA for disposition
  - 2 step: COE Report of Excess; then SF 118, which GSA receives and reviews for completeness (takes 30-45 days approximately); if it's complete, GSA will proceed; if not, may return it to COE for additional information.
  - However, screening to ascertain non-DOD federal agency interest in the property can begin as soon as the Preliminary ROE is received
- ii. **Federal Transfer:** If a Federal agency is interested in property, GSA will appraise & offer it at fair market value. Any homeless agency interest conveys through HHS. Property is determined surplus if it is not transferred to another federal agency.
- iii. **Homeless and public body screening:** a checklist is prepared to determine whether it is suitable for homeless use and delivered to HUD; HUD publishes an available property notice for 30 days in the Federal Register.
  - GSA also screens the property with local government at this stage; GSA encourages county and local government involvement in the homeless review process as well
  - Homeless agencies get 60 days to ascertain interest in property. If competing interests, homeless agency gets priority through HHS. There is a 90-day process for the application/approval process and GSA may get requests for an extension (90 to 180 days).
- iv. **Discount Conveyance:** Property available for certain public uses at less than market value, up to 100% discount (airport, correctional, law enforcement/public safety, education, historic, homeless, self-help housing, park and recreation, public health, wildlife conservation) through HHS or DOI or DOJ.
- v. **Negotiated Sale:** To eligible public bodies for other public uses, such as an administration building; an appraisal will be done and fair market value is required
- vi. **Public Sale:** Offered to public and private parties via auction or sealed bid, fair market value is required

While the homeless and public body screening is in progress, GSA will consult with the State Historic Preservation Officer (SHPO) on how to protect the property if it leaves federal ownership. A Programmatic Agreement (PA) or Memorandum of Agreement (MOA) will detail how property will be protected. If problems arise, GSA will work with the Advisory

Council on Historic Preservation to resolve them. In general, GSA's NEPA process encompasses a number of acts – endangered species, underground contamination, etc. After 180 days or so, GSA could go forward with the next steps.

### **3. Local government comments and questions**

Gwen Wright (M-NCPPC) asked about the realistic schedule for offering the property to the County. Ernest Cooper said that this (public body screening/discount benefit process) could happen around September or October 2000. Although the final ROE is not expected until April, the federal agency screening stage could be done before that. GSA can't prepare the homeless suitability checklist until they get sufficient information with the ROE.

Gwen Wright asked if the Army is responsible for environmental cleanup and abatement; will the EA show underground contamination? Bobby Roberts answered that the Army cannot transfer a contaminated site, but can transfer property with certain other known hazards such as PCBs in light ballasts or lead-based paint. Virginia Farris, CH2M HILL, said that everything known at this point is reported in the EA; soil and groundwater sampling is not done for an EA - the information is based on prior use records, spill reports, surveys and other investigations done by the Army, etc. There is no evidence of underground contamination, but the Army is still assessing a small area of stained soil and flooring in Building 120 (which may or may not be completed before the final published EA). Bobby Roberts said this staining might have come from overfilling a tank.

Gwen Wright asked if the government will certify that the site is clean. Ernest Cooper said that GSA will, depending on the Army's report of excess (and attached reports). Bobby Roberts added that the Army is responsible (cradle to grave) for any clean-up of any hazardous substances that were released while the Army owned it; if such contamination is discovered at a later time, the Army would come in and clean it up for the new owner.

Scott Reilly (Office of the Montgomery County Executive) asked what happens if GSA gets a request for individual buildings? Ernest Cooper replied that GSA intends to dispose of the the whole site (as one parcel). After screening with public bodies and homeless agencies, GSA will advertise the property widely. They will try to funnel any inquiries they receive through the County's economic development office; however, sometimes people will bypass that opportunity and GSA could get a bidder "out of nowhere" who had not made any previous inquiries. GSA is required to seek the best price offer in any public sale. Bobby Roberts added that the Army wants the County involved, because jurisdiction will go back to the County when the federal government divests itself of the property.

Ernest Cooper noted that GSA will hold about 120 days of marketing, viewing, and open houses, on a specific schedule. They don't want to use WRAMC's resources (to open locked buildings and escort visitors), just because they are in Atlanta and Henry Mitchell (WRAMC's Facilities Manager) is here. Once GSA gets the ROE they will handle tours of the property. Tracy Porter, WRAMC Chief of Master Planning, added that WRAMC will not entertain any more tours until GSA takes over. Ernest Cooper said that, with all this, it could be anywhere from 9 months to 1-½ years before the property goes up for sale.

Scott Reilly asked for clarification that GSA will not entertain options or contingent offers while a developer is exploring rezoning. Ernest Cooper said, no, they will not; that might

devalue the property, but will be accounted for in the appraisal. Scott Reilly said that's why it's important to involve M-NCPPC in the information provided to potential bidders.

Gwen Wright added that GSA should also funnel inquiries through M-NCPPC (in addition to the Economic Development office), because they have more information about the property. She sees a problem in that developers won't want an un[re-]zoned property, but M-NCPPC doesn't want to rezone until they have an idea of the ultimate reuse. Bobby Roberts said to expect some pressure to rezone before a developer will put up any money.

Ernest Cooper said that, when GSA recently disposed of some unzoned Navy property (a cement plant in Bristol, TN, which was marketed as industrial property due to its prior use), they told developers to talk to the City, as part of their own due diligence, before making an offer. Gwen Wright said that County agencies need to get together to decide on parameters of what they will support; the good news is that it looks like the County will have about a year to do that. The North and West Silver Spring Master Plan is wrapping up, but the issue of future zoning for this property was deferred; a final draft is going to the County Executive for 60 days before it goes to the County Council for approval. Tracy Porter requested a copy of the current version of the Master Plan.

Scott Reilly said that the County's Department of Economic Development is aware of tax incentives available through the County or State, but these are mostly related to job creation or historic property tax incentives, etc. This property is not in the Silver Spring Enterprise Zone but it could be considered for a similar district; the County needs to work with the planning board to decide use. As stated before, the County has three main priorities: a proposed development should stand financially on its own; should maintain historic integrity; and be compatible with the surrounding neighborhood, especially traffic.

Ernest Cooper cautioned that GSA will let the County know what kind of advertising is planned and any inquiries they get, but once it hits the Internet—we lose control.

Cliff Kidd (COE Baltimore District) asked if, prior to the 120-day marketing period, covenants will be worked out to protect historic properties and Section 106 consultation must be resolved? Ernest Cooper said yes, that is the goal. Cliff Kidd asked if the September-October 2000 estimated time for County screening (offer for discount conveyance) would occur before GSA advertises the property for public sale. Ernest Cooper replied that no advertising will be done until public body and homeless screening is done, Section 106 consultation is complete, and agreement is reached on any contamination issues (but they are under the impression that this property is essentially clean).

Bobby Roberts asked if sale could proceed once that agreement and any easements needed for future cleanup (if any) are determined? Ernest Cooper said yes, GSA can transfer contaminated property before it's cleaned up, but normally doesn't; for early transfer authority, would have to get the Secretary of the Army and the state to sign, which takes a lot of time. Bobby Roberts noted that contamination of that type is not expected here; the Army's biggest issue is usually unexploded ordnance, which is not a problem here because it was a hospital. Tracy Porter said that, however, sometime last year the Environmental Division did find and take care of 2 unexploded ordnance items in the Glen behind the parking lot (one was a dud that was removed and the other was exploded in place); it's unknown how they could have gotten there.

Gwen Wright asked whether GSA would only transfer the property as a whole parcel for homeless use. Ernest Cooper responded that they do not plan to parcelize for homeless use.

The estimated timeline for Section 106 consultation was discussed. It depends on when GSA gets the necessary information from the Army and the SHPO's own timeframe. GSA will take documentation [on the historic buildings] supplied by the Army and approach the SHPO to discuss proposed covenants, in accordance with federal and Maryland regulations.

Gwen Wright added that, if the property goes to a private owner, the county's own historic preservation law will apply. Covenants negotiated between the SHPO and GSA won't necessarily hold when the County Historical Commission is reviewing an action. The county's law is stronger than Section 106; it's not just consultation, it's more like a permitting process. (She spoke with the GSA market survey preparer about this issue.) She is an M-NCPPC staff member, not a Commission member; perhaps the Montgomery County Historical Commission should be a signatory to the programmatic agreement to avoid later conflicts (but it would have to be all 9 members, not just the chairman). We wouldn't want a "Catch-22" where the SHPO has OK'd demolishing a specific building but the Historical Commission says no. Scott Reilly agreed that getting the Commission involved upfront would reduce uncertainty for the new owner.

Bobby Roberts said [a problem getting the Section 106 process started is that] the SHPO has been looking at this as one federal action, with the property going from the Army to GSA to the new owner. Although the Army will sign the agreement, GSA is the driver. Katherine Basye said that it's really two undertakings, but she noted that [SHPO staff] Lauren Bowlin's opinion was that a separate agreement for excessing [Army's action] is a wasted effort; she would prefer to negotiate a programmatic agreement for disposal [GSA's action] that saves most of the buildings while keeping the property saleable. Ms. Bowlin has said she prefers to prioritize buildings (like the Ballroom, Pagoda, etc.) and wants the Army to be a signatory because the Army is responsible for the property until it is sold. Bobby Roberts noted that the Army only has a set amount of money (\$400k/year) for maintenance until the new owner takes the property.

Tracy Porter asked, who will represent the interests of SOS in the negotiations? The SHPO or M-NCPPC? Katherine Basye said that, initially, the SHPO and M-NCPPC will be involved as primary signatory parties; then they will recommend who should be non-signatory consulting parties (such as SOS).

Gwen Wright said that, since all the buildings are significant, a decision on which ones are expendable will depend on the quality of a development proposal. SOS and the Historical Commission won't want to sign a "death certificate" for individual buildings. The feasibility study in 1995 looked at this; the biggest issue will be which parts of Main [Building 101] will stay or go.

Katherine Basye suggested some kind of rating system; ideally, nothing would get knocked down at all, but that's unrealistic. Gwen Wright said she would be hesitant to rank individual buildings before the GSA marketing phase and seeing the response from the private sector; she would rather develop a list of criteria (i.e., structural condition, viability, level of historic significance) by which proposals that involve demolishing buildings can be ranked.

WRAMC DPW staff noted that the 1996 Higgenbotham Briggs & Associates study looked at life safety and fire safety issues, and then recommended which buildings to keep, based on their potential for reuse. Gwen Wright requested a copy of that study. WRAMC will need to find another set; a full set of those reports was placed in the Silver Spring library in 1997, but it is no longer there.

Bobby Roberts cautioned that, having been inside the buildings, representatives here have seen the shifting foundations that cannot easily be fixed, if at all. A developer will come to same conclusion and will want to demolish at least some buildings. One concern is that GSA will not cooperate with the Army in future if this property cannot be marketed due to excessive restrictions. Gwen Wright agreed that M-NCPPC does want the property successfully transferred out of Army hands. Ernest Cooper stated that he is still hopeful that disposal will be accomplished.

### **Concluding statements**

Army: The Army and GSA will call the initial Section 106 consultation meetings and plan to start formal consultation in January. We need to identify the signatory and consulting parties, then map out a process. The Advisory Council on Historic Preservation has resisted getting involved so far, until the decision about the extra parcels is made, but that should not be a major issue. The public meeting tonight will be the last one, so one question is, should SOS and the local citizens groups be involved in future local agencies meetings?

NCPC: It would be best to work on two tracks, agencies and public. The public should be invited in when you want their comments. There will have to be some public meetings as part of the Section 106 process. At a minimum, the contents of the programmatic agreement will have to be advertised to the public before it is signed.

Montgomery County Executive's Office: We are awaiting the final North and West Silver Spring Master Plan. The draft said that current zoning is residential and that the Planning Board will consider a minor master plan amendment only when there is a development proposal. Rezoning involves a site assessment that goes beyond the Section 106 process.

M-NCPPC: No further comments.

ACHP, Maryland Historical Trust/SHPO, and Congressional representatives were not present.

### **4. Next local agencies meeting**

The next meeting date was tentatively set for Wednesday January 19 or Thursday January 20, with a preference for Thursday January 20.

## **ATTACHMENT 1: ATTENDEES**

National Park Seminary Historic District  
Forest Glen Annex  
Walter Reed Army Medical Center

**Local Governments Meeting**  
**October 28, 1999; 10 a.m. – 12 p.m.**

Katherine Basye  
Army Corps of Engineers, Baltimore District  
Planning Division

Nancy Witherall  
National Capitol Planning Commission

Gwen Wright  
MD National Capitol Park and Planning  
Commission

Audrey Entorf  
General Services Administration – Atlanta

Ernest Cooper  
General Services Administration – Atlanta

Marjorie Marcus  
Walter Reed Army Medical Center  
Directorate of Public Works

Henry Mitchell  
Walter Reed Army Medical Center  
Directorate of Public Works

Tracy Porter  
Walter Reed Army Medical Center  
Directorate of Public Works

Phyllis Runci  
General Services Administration – National  
Office (Washington DC)

Naomi Chisley  
General Services Administration – National  
Office (Washington DC)

Mary Chase  
General Services Administration – National  
Office (Washington DC)

Beverly Chidel  
Walter Reed Army Medical Center  
Public Affairs Office

Scott Reilly  
Office of the County Executive/PI  
Montgomery County MD

Clifford Kidd  
Army Corps of Engineers, Baltimore District  
Planning Division

Joan Malloy  
Walter Reed Army Medical Center  
Public Affairs Office

Mark Willey  
CH2M HILL–Atlanta, GA

Virginia Farris  
CH2M HILL–Herndon, VA

Pam James  
CH2M HILL–Herndon, VA

## ATTACHMENT 2: AGENDA

National Park Seminary Historic District  
Forest Glen Annex  
Walter Reed Army Medical Center

**Forest Glen Local Governments Meeting**  
**October 28, 1999; 10 a.m. – 12 p.m.**

### Agenda

- 1) U.S. Army
  - a) Actions & progress since last meeting
  - b) Status of the EA
  - c) Public comment period for the EA
  - d) Current schedule for disposal milestones
  - e) Purpose of the Public Information Meetings
- 2) GSA
  - a) Brief recap of the 5-step property disposal process (Ernest's slide from public meeting)
    1. **Excess:** Agency reports property excess to GSA for disposition
    2. **Federal Transfer:** Determined surplus is not transferred to another federal agency
    3. **Discount Conveyance:** Property available for certain public uses up to 100% discount (airport, correctional, law enforcement/public safety, education, historic, homeless, self-help housing, park and recreation, public health, wildlife conservation)
    4. **Negotiated Sale:** To eligible public bodies for other public uses, fair market value required
    5. **Public Sale:** Offered to public and private parties via auction or sealed bid, fair market value required
  - b) Current GSA actions
  - c) Possible developer tax incentives
- 3) Comments From Local Governments
  - a) Montgomery County Executive Office
  - b) MD National Capital Parks and Planning Commission
  - c) MD Historical Trust
  - d) Advisory Council on Historic Preservation
  - e) National Capital Planning Commission
- 4) Set Date For Next Meeting

## June 30, 1999, Local Agencies Meeting: National Park Seminary Historic District Excessing/Disposal

<b>ATTENDEES:</b>	Maryland National Capital Parks and Planning Commission (Nancy Sturgeon, Eve Tapper, Clare Cavicchi)	US Army Medical Command (LTC Garrett Sullivan, Bobby Roberts)
	Senator Sarbanes' office (Jeannie Lazerov)	Walter Reed Directorate of Public Works (Dignant Dhru, Ed Awni, Tracy Porter, Margie Marcus, Henry Mitchell)
	Congresswoman Morella's office (Keith Tobias)	Walter Reed Office of General Counsel (Ashby Dyke)
	Montgomery County Executive Duncan's office (Scott Reilly)	Walter Reed Public Affairs Office (Ben Smith, Joan Malloy)
	General Services Administration Region 4/Atlanta, Property Disposal Division (Ernest Cooper)	Walter Reed Army Institute of Research, NMRC Transition (Pete Esker)
	GSA Headquarters, Office of Property Disposal (Naomi Chisley)	Army Chief of Staff for Installation Management (Susan Habit, MAJ Dedner)
	GSA Headquarters, Office of General Counsel (Richard Butterworth, John Field)	CH2M HILL (Virginia Farris)

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**NOTES BY:** Virginia Farris

**DATE:** July 2, 1999

The purpose of the second meeting with local and regional planning agencies was to:

- Make sure all involved agency representatives are familiar with the property and buildings
- Achieve a better understanding of each agency's role in the overall disposal process
- Identify concerns that each agency may have over the action and process

The group met on June 30, 1999, in the conference room in the WRAIR construction project office (Building 172) at Forest Glen Annex. The first action was to take a short tour of the NPSHD, primarily the interior of Building 101 and site exterior, from 1:15-2:30 pm.

Bobby Roberts, US Army Medical Command (MEDCOM), opened the meeting at about 2:45 p.m. He updated the group on the Army's progress with the excessing action and the Environmental Assessment (EA). GSA provided a recap on the GSA disposal process.

Bobby Roberts described the Report of Excess process: first, there is an internal Army ROE, followed by preparation of the SF 118 which is delivered to the GSA. The Draft Report of Excess is expected in late September, which will allow GSA to begin limited screening. He provided a general schedule for the EA: a preliminary draft (quality check) is being reviewed now; the Final Draft EA will be done in August; the Final EA should be done in



November (roughly); after a 30-day comment period on the Final EA, the Army will consolidate and review public comments to see if they are adequately addressed by EA. GSA will also do another EA for disposal and reuse; the Army's EA is for transfer (excessing).

Each agency present was then asked to describe their role in the excessing, disposal, and redevelopment process ahead and to state their concerns about the process.

Bobby Roberts stated that the Army's goal is to bring the property back to some productive use; the Army's primary concern is ability to find a taker, make it marketable.

Ernest Cooper summarized GSA's screening process. If the property goes all the way to public sale, they expect a 120-day period to market it, have tours, provide a location to pick up information on the property. Although GSA looks primarily to local government for public involvement, both their NEPA process and Section 106 process (which start when they receive the Report of Excess) will have opportunities for public comments. GSA's primary concern is which buildings should have protective covenants, since this will limit developers' options.

There was a general discussion on how this will be determined. Rich Butterworth, GSA, suggested this could start during negotiation of Army's Section 106 Memorandum of Agreement (MOA) for the excessing action, if interim maintenance of specific buildings is prioritized; GSA's MOA specifying covenants could pick up where the Army's MOA for maintenance leaves off. Setting priorities for maintenance makes sense, but until GSA does some marketing, they won't know what impact covenants for specific buildings will have on marketability. Tracy Porter mentioned that Montgomery County could be a consulting (if not signatory) party to either or both MOAs under the new Section 106 regulations. M-NCPPC's Historic Preservation Office offered to help WRAMC draw up a buildings priority list.

(NCPC representatives who came on the tour had to leave early; they will email their input to Bobby Roberts.)

Nancy Sturgeon, M-NCPPC, described the county's zoning and site plan review process. The current zoning of the NPSHD parcel is R-90, which allows certain public uses as special exceptions in a residential zone (private education, elderly housing, charitable uses). A minor master plan amendment will be considered for rezoning to a different use, once they know who the next owner will be; there are lots of possible categories. One possibility is "MXPD", a mixed-used housing and commercial zone, not too dense, for parcels of at least 25 acres. The master plan for North and West Silver Spring has slowed down, while they take a hard look at traffic and access in the Montgomery Hills area (Georgia Avenue and Seminary Road, near the NPSHD). M-NCPPC's main concern is traffic impacts and compatibility with the surrounding community.

The group discussed how developers can find out if their concepts would be acceptable to the county, because GSA's disposal process doesn't allow time for a formal review before making an offer. Developers can bring concepts to the county's weekly Regulatory Review Commission meeting, which is attended by all the agencies who get involved in development and permitting, for a pre-preliminary review and feedback (within 30-60 days?).

Actual rezoning and site plan review takes much longer (roughly six months for rezoning), but can be fast-tracked by concurrent reviews; some of that was done for the downtown Silver Spring revitalization effort. GSA's RFP and Federal Register notice will include information on the current zoning and the county's policy (if adopted in master plan) that minor master plan amendment for NPSHD reuse will be considered. M-NCPPC can help with the public involvement aspect by calling meetings, attending civic group meetings, working their regular contacts with citizens and businesses.

The Montgomery County Executive's Office is prepared to:

- Foster the county's 3 main goals (preserving historic buildings, getting an economically viable reuse, and maintaining compatibility with community—especially traffic), while recognizing that these goals are somewhat incompatible
- Foster community input and buffer the Army and GSA from some types of adverse civic input
- Advocate for rezoning and facilitate environmental review and permitting for a developer
- Act as an intermediary between GSA and an end user, specifically for public benefit uses

The concerns of the county's executive branch are:

- Early identification of requirements for historic preservation
- Making a quick decision on the optional parcels
- Possible conflicts from current uses of property (Bobby Roberts noted that all of the officer housing is now vacant; SOS and homeless shelter leases are short term and revocable at will by the Army)
- Reserving part of site for homeless use if it could impede use of the rest (GSA noted that they will notify County of any applications from homeless assistance groups and also that McKinney Act screening will be for the whole NPSHD property; if parcelizing for homeless use would prevent effective transfer of the whole property, that would be grounds to deny an application)

Goals and concerns of the congressional office representatives were the same as already expressed by others.

The next public information meeting was tentatively set for **Wednesday, October 27**, at 7:00 p.m., at Forest Glen in the new WRAIR building auditorium (it seats 300 people). The next local agencies meeting will be that morning, unless there is some major change in the process, in which case an earlier local agencies meeting will be called.

The meeting was adjourned around 4:30 p.m.

## May 11, 1999, Local Agencies Meeting: National Park Seminary Historic District Excessing/Disposal

<b>ATTENDEES:</b>	Maryland National Capital Parks and Planning Commission (Nancy Sturgeon, Eve Tapper, Gwen Marcus)	GSA Headquarters, Office of Property Disposal (Celia Brooks, Naomi Chisley)
	National Capital Planning Commission (David Hamilton, Nancy Witherell, Gene Keller)	GSA Headquarters, Office of General Counsel (Richard Butterworth)
	Senator Sarbanes' office (Jeannie Lazerov)	US Army Corps of Engineers, Baltimore District (Clifford Kidd)
	Congresswoman Morella's office (Keith Tobias)	US Army Medical Command (Bobby Roberts)
	Montgomery County Executive Duncan's office (Scott Reilly)	Health Facilities Planning Agency (Sedi Graham)
	Advisory Council on Historic Preservation (Ralston Cox)	Walter Reed DPW (Ed Awni, Tracy Porter, Margie Marcus, Henry Mitchell, David Doyle)
	Maryland State Historic Preservation Office (Michael Day, Lauren Bowlin)	Walter Reed Office of General Counsel (Ashby Dyke)
	General Services Administration Region 4/Atlanta, Property Disposal Division (Audrey Entorf, Ernest Cooper)	Walter Reed Public Affairs Office (Ben Smith, Joan Malloy)
		CH2M HILL (Virginia Farris, Mark Willey)
<b>COPIES:</b>	File	
<b>NOTES BY:</b>	Virginia Farris	<b>DATE:</b> May 11, 1999

The purpose of this meeting was to:

- Discuss with local and regional planning agencies of the Army's intent to declare the National Park Seminary Historic District (NPSHD) to be an excess property
- Introduce these agencies to the process for excessing and disposal of federal property and the associated National Environmental Policy Act (NEPA) process
- Update them on progress to date
- Preview the information to be provided at a public meeting the same evening

The meeting was held on May 11, 1999, in the conference room in the WRAIR construction project office (Building 172) at Forest Glen Annex.

Tracy Porter, Walter Reed Army Medical Center (WRAMC), opened the meeting at about 10:00 a.m. CH2M HILL and General Services Administration (GSA) briefed the group on the excessing and disposal process, the Environmental Assessment (EA) required under NEPA, and the measures being taken to inform the public about these actions.

Questions were asked about the timeline for these actions. The excessing and Army NEPA process will take about a year. The GSA's screening and disposal process could take anywhere from one to three years, depending on uncertainties like the National Historic Preservation Act (NHPA) consultation process and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process [for investigating and remediating any contamination before transferring the property out of federal ownership, if that occurs].

The boundary of the parcel to be excessed was discussed. Tracy Porter said that at a minimum, it will be the 26-acre parcel identified in the 1992 Master Plan. There is a possibility of excessing two adjacent parcels, to make the deal more attractive to prospective developers; it could be up to 38 acres total. This is a pending decision for the commanding general; these parcels have facilities on them that WRAMC still needs. Bobby Roberts, US Army Medical Command (MEDCOM), said that whether or not the NPSHD property itself should be excessed is no longer under discussion; the Army hopes to get the necessary paperwork (Report of Excess) to GSA by the end of the year.

Lauren Bowlin, representing the State Historic Preservation Officer (SHPO), stressed that the extra parcels would be useful and this should be decided as quickly as possible, to move the NHPA consultation process along. Rich Butterworth said that GSA can look at prior inquiries about the property and do some limited pre-marketing to support the Report of Excess and to help determine the market demand for the extra parcels.

Several questions were asked about how GSA will market the property for sale. Ernest Cooper explained that GSA has an active database of people looking for property; the marketing effort will be not just local but global, with both written information and tours being offered; GSA plans to work closely with the county. That's a long time off yet; GSA wants to make contact with private parties, but can't proceed too far until they know if a federal agency wants the property. In the meantime, if inquiries are received by the County or WRAMC, they should be referred to GSA (either Ernest Cooper in Region 4 or Celia Brooks in the DC office), to be followed up when (if) the property goes to public sale.

In answer to the question of why two different environmental assessments (EAs) will be prepared, Rich Butterworth said that's because there are two separate federal actions. The Army's EA covers the excessing action and documents the environmental condition of the property; it might have been a categorical exclusion, except for the significant historic property involved. GSA's EA will cover the disposal action and subsequent reuse of the property.

A discussion of various agency roles and goals for this process followed.

The National Capital Planning Commission (NCPC) looks at federal actions in the Capital area; their 30-day review will focus on how the county wants the property developed, land use compatibility, and similar issues. If the community has concerns that are not answered, citizens can testify, which can delay NCPC's recommendation by another month. NCPC doesn't get involved in the Army's excessing process, but will receive the Report of Excess from GSA. NCPC wants to see a balance between federal and community interests.

Nancy Sturgeon said Maryland-National Capital Parks and Planning Commission (M-NCPPC) is in the process of doing a Master Plan update for the surrounding area, which

considers the same general issues. The current county zoning is R-90 (low-density residential); the master plan will be amended if a zoning change is needed, because that doesn't match the buildings and their historic uses.

Gwen Marcus noted that M-NCPPC had conducted an extensive public involvement process in 1994, planning for potential reuse, which doesn't need to be repeated. The community is interested in historic preservation and a low-impact (non-commercial) reuse with low traffic impact, such as senior housing.

Scott Reilly stated that Montgomery County's goals for this process are (1) to preserve as much of the property as possible, (2) to get an economically viable reuse for the property (so redevelopment doesn't stop midway due to bankruptcy), and (3) to keep the reuse compatible with the surrounding residential community, especially in terms of land use and traffic. Once the property gets into private hands, there will be a lot of county input through the site plan review process. There is some conflict between the county's goals, particularly a tension between economic viability and minimizing traffic, which the local agencies will need to resolve among themselves.

Bobby Roberts said that the Army wants to be a good neighbor, to have a successful excessing action with the Army divested of the property, to see the community's and the county's needs fulfilled as much as possible, and to get a good neighbor for the Army in the new owner. Tracy Porter noted that the community needs to understand that some increased traffic is inevitable, because the property is vacant now. Any roadway improvements would be up to the developer. Gwen Marcus said the extra parcels could be useful as transportation access points.

Rich Butterworth noted that reuse restrictions to avoid traffic impacts and preserve historic buildings will affect GSA's ability to market the property. Gwen Marcus felt that the agencies can't make all these decisions in advance. They may have their priorities, but should not require preserving specific buildings, for example, if that would stop an otherwise good project. It will be an interactive process.

Ralston Cox, Advisory Council on Historic Preservation (ACHP), would like to see a market test before the commander decides about the extra parcels; need to be cooperative and creative about making that happen. He believes that the community's overriding goal is to get the property out of the Army's hands. He is impressed with GSA's track record in marketing. The redevelopment of the Old Post Office building in DC is a good example of setting general preservation priorities while recognizing market realities. Doing that kind of preservation homework in advance will help avoid surprises.

Rich Butterworth said that GSA will negotiate an MOA with the SHPO concerning development restrictions. If that makes the property unmarketable, the MOA could be revisited at some time in the future. GSA is committed to making disposal happen if at all possible. The property will not go back to the Army unless there is some major environmental problem.

Gwen Marcus reminded the group that M-NCPPC's 1994 study showed an economic deficit even with the most creative concept, including extra parcels. A developer will probably expect some public-private partnership and funding. Hopefully, GSA won't ask a lot of money for the property. Ernest Cooper said GSA should get fair market value. They will

have a local appraisal that will take historic property and environmental constraints into account. The county can also have their own appraisal done if they wish. Bobby Roberts noted that the Army doesn't get any proceeds from the sale; it goes back to the Treasury. NCPC said the county must recognize its own goals through zoning, which will also affect the appraisal.

GSA, M-NCPPC, and the Army discussed how and when the county can get involved in public benefit and/or private development acquisition. Ernest Cooper said there are legal limits on how the county can get involved in property transfers to private parties. GSA can only deal directly with developers via an impartial public sale process. Ernest Cooper stated that the county plays a vital role; it's important for the county not to miss its chance to get the property for public benefit uses before it goes to private sale.

Rich Butterworth brought up the issue of McKinney Act screening; if a homeless assistance group wants the property, the county may need to work something out so they can relinquish their claim here and get some equivalent property elsewhere. Ernest Cooper noted that HUD finds nearly all properties to be "suitable" for homeless use, but this can include things like storage of supplies. If HUD approves an application, GSA must make the conveyance. GSA will notify the county but won't get involved in negotiations. GSA's intent is to dispose of the property as a whole, which means a homeless assistance group would probably have to be willing to acquire the whole parcel, not just one building.

Gwen Marcus suggested an interagency working or advisory group could meet over the next year to work out some of these issues. Tracy Porter said she doesn't see any problem setting up a technical advisory group. Bobby Roberts said there is a Forest Glen working group at the Department of the Army level, which includes GSA, and that the county, state, and others will be brought into these discussions as soon as federal issues are resolved.

Army and GSA personnel discussed interim maintenance of the property, pending disposal. After the Report of Excess is accepted, there is a roughly 15-month period when the Army is responsible for maintenance; if marketing takes longer than that, GSA will probably fund maintenance but ask the Army to perform it. Bobby Roberts said that Army has committed \$1 million for repair and stabilization this year and \$400,000 for annual maintenance thereafter, which means keeping the outer shells of the buildings tight. The SHPO was involved in planning the stabilization work, which Tracy Porter said included actions like roofing, gutters, and stucco repairs; that type of work won't be done under annual maintenance.

Ralston Cox, ACHP, asked about the status of asbestos and lead-based paint in the buildings. Tracy Porter said WRAMC did a full survey in 1996. Bobby Roberts noted that asbestos and lead-based paint generally are considered "acceptable" contaminants for "as-is" property transfer; environmental clearance focusses more on things like leaking underground storage tanks and old dumps/disposal areas. The asbestos and lead-based paint surveys will be made available to prospective buyers and also to applicants under the McKinney Act screening.

Ben Smith, WRAMC Public Affairs Officer, will be the single Army point of contact for inquiries, for the duration of the Report of Excess process.

The meeting was adjourned at about 12:30 p.m.

## **1997 Scoping, Public Involvement and Agency Coordination**

# 1997 Scoping Process

## Notice of Intent

On June 3, 1997, the public was notified of the Army's intent to prepare an EIS for reuse of the NPSHD by publication of a Notice of Intent (NOI) in the *Federal Register*. The NOI was concurrently published in the *Washington Post*, the *Washington Times*, and the *Montgomery Journal* and was mailed to agencies and other potentially interested parties.

## 1997 Scoping Meeting and Comment Period

An open, public scoping meeting was held on the evening of July 14, 1997, at Woodlin Elementary School near the Forest Glen Annex in Silver Spring, Maryland. The purpose of the scoping meeting was to gather initial public input on issues and concerns pertaining to the alternatives for Army reuse of the NPSHD.

Efforts were made to reach agencies and people with a potential interest in the proposed action. Announcements of the public scoping meeting were published in the *Washington Post*, the *Washington Times*, and the *Montgomery Journal* on June 30, 1997. Letters and fliers were mailed to agencies, civic groups, and other potentially interested parties.

More than 100 people attended the scoping meeting and 27 individuals or agency representatives presented oral comments. A verbatim transcript of the comments presented at the scoping meeting was prepared for the record. People who attended the scoping meeting or submitted written scoping comments were added to the mailing list for future public notices.

Two weeks after the scoping meeting, at the request of members of the public, the Army extended the 30-day scoping comment period by another 2 weeks, to provide more time for additional written comments. A notice of the comment period extension was advertised in the *Washington Post*, *Washington Times*, and the *Montgomery Journal* on July 30, 1997, and was mailed to those on the mailing list, including all who had attended the scoping meeting.

By the end of the scoping comment period, approximately 65 separate scoping comment letters or other written communications had been received. Many of these were in petition format and included signatures from numerous individuals.

## Summary of Scoping Comments

The commentors strongly expressed interest in the future of the NPSHD and concern over the condition of the historic buildings and the disposal and reuse of the site. Questions, concerns, and suggestions included the following:

- Strong concern about the deteriorating condition of the historic buildings
- Strong preference for complete rehabilitation of all the historic buildings
- Strong preference for excessing and disposal of the NPSHD, if it included preservation of the historic buildings and adaptive reuse by others



- 1 • Support for reuse by the Army if it involved rehabilitation of majority of the historic  
2 buildings and preserving the integrity of the site
- 3 • Conditional acceptance of partial demolition and reuse, depending on the historic  
4 buildings preserved; the Ballroom was specifically mentioned in a number of  
5 communications
- 6 • Opposition to a continuation of the current situation
- 7 • Opposition to complete demolition of the historic buildings
- 8 • Concern about the viability of disposal, because of the cost and liability risks to potential  
9 developers (fire hazard, insurability, risk of litigation by concerned parties)
- 10 • Suggestion that a disposal alternative include possible disposal to public or nonprofit  
11 entities, or a public/private affiliation, as well as private entities
- 12 • Support for mixed reuse by multiple users, including the Army
- 13 • A suggestion to lease or sell the four former sorority houses that are closest to the  
14 surrounding neighborhood as private residences
- 15 • Concern that new facilities proposed by the 1992 Master Plan for Forest Glen would be  
16 sited on NPSHD (instead of previously identified sites elsewhere on Forest Glen Annex)
- 17 • Concern that reuse of the NPSHD by the Army or other parties might not be compatible  
18 with the surrounding single-family residential community
- 19 • Concern that reuse of the NPSHD might generate a significant amount of additional  
20 traffic on narrow neighborhood streets like Linden Lane
- 21 • Request that an immediate priority should be to address the fire hazard of abandoned  
22 buildings, which should not wait until final decision and action on the property
- 23 • Declining property values and difficulty in selling houses in the Forest Glen Park  
24 neighborhood because of deteriorating buildings on adjoining Army property
- 25 • The Army's responsibility for stewardship of historic properties
- 26 • The value of the NPSHD to the community and its contribution to the history of both  
27 women's education and Army medical care
- 28 • Sensitive environmental resources on the site (mature trees and stream valley)
- 29 • The aesthetic values of the historic buildings, as compared to modern office buildings or  
30 other buildings that might replace them if they were demolished

31

## PROOF OF PUBLICATION

I, Ryan E. Phillips, Publisher of the MONTGOMERY & PRINCE GEORGE, a newspaper in the County/City of MONTGOMERY & PR. GEORGE published in the English language, and having a bona fide list of paid subscribers located in the aforementioned County/City, and entered as second class matter under the Postal Laws and Regulations of the United States of America for 52 successive weeks or more prior to the issue of 06/30/1997, certify that the notice of SCOPING MEETING 7/14 for CH2M HILL attached hereto has been published in said newspaper 1 times for 1 issues consecutive, commencing with the issue of 06/30/1997.

*Ry - E. Phill*

RYAN E. PHILLIPS

Sworn to and subscribed before me this 30th day of June, 1997.

*[Signature]*  
My commission expires

**FEB 28 2001**

Ad number: 276239  
End date: 06/30/1997  
06/30/1997, 1x

VIRGINIA FARRIS

## PUBLIC SCOPING MEETING

### Environmental Impact Statement for Reuse of Property at the Forest Glen Annex of Walter Reed Army Medical Center, Montgomery County, Maryland

The Department of the Army proposes to reuse property known as the National Park Seminary Historic District, located at the Forest Glen Annex of the Walter Reed Army Medical Center (WRAMC) in Montgomery County, Maryland.

In accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality (CEQ) regulations published at 40 CFR Part 1500, Army Regulations 200-2, the Department of the Army intends to prepare an Environmental Impact Statement (EIS). The EIS will assess the potential environmental effects associated with a reasonable range of reuse options. Several potential reuse options were set in a Notice of Intent (NOI) to prepare an EIS. An was published in the *Federal Register*, *The Washington Post* and the *Montgomery Journal* on June 3, 1997 in *The Washington Times* on June 4, 1997.

As part of the process of preparing an EIS, the Army is holding a public scoping meeting on July 14, 1997 at the Woodlin Elementary School auditorium/cafe located at 2101 Luzerne Avenue, Silver Spring, Maryland. Registration will begin at 7:00 p.m. and the meeting will begin at 7:30 p.m.

The purpose of the scoping meeting is to provide the public with an opportunity to participate in the identification of environmental issues as well as to assist in the development of reuse alternatives for consideration in the EIS.

The public is encouraged to attend the scoping meeting and offer comments. Written comments may be submitted by July 29, 1997, to:

**Ben Smith, Public Affairs Officer  
ATTN: MCAT-PA (Ben Smith)  
Walter Reed Army Medical Center  
6900 Georgia Avenue, NW  
Washington, DC 20307-5001**

Several structural assessment studies have been prepared, to document the property's existing condition, suitability for reuse, and basic repair needs. These studies will be among the references used for the EIS. Those reports are available for public review at:

**Montgomery County Public Library  
Silver Spring Branch  
8901 Colesville Road  
Silver Spring, MD 20910**

June 30, 1997

027

Ad # 172177 Name CH2M HILL Size 98 lines  
Class 820' PO # PO# Authorized by VIRGINIA Account C1339690

M0020

PROOF OF PUBLICATION

**The Washington Post**

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Player David well known to me to be Manager, Billing & Verification of The Washington Post, a daily newspaper printed and published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was printed and published in The Washington Post, a daily newspaper, upon the following date at a cost of \$861.42.

Published 1 time. Date 6/30/97  
Account C1339690

*Player J. David*

Witness my hand and official seal this 1<sup>st</sup> day of July 19 97

*Lucienne M. Chaffier*

Lucienne M. Chaffier

Notary Public, District of Columbia

My commission expires

My Commission Expires, Dec. 31, 2002

PUBLIC SCOPING MEETING

Environmental Impact Statement

for Reuse by the Army of Property at the Forest Glen Annex of Walter Reed Army Medical Center, Montgomery County, Maryland. The Department of the Army proposes to reuse the property known as the National Park Seminary Historic District, located at the Forest Glen Annex of the Walter Reed Army Medical Center (WRAMC) in Montgomery County, Maryland.

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M0021

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Ben Smith, Public Affairs Officer

Attn: MCAT-PA (Ben Smith)

Walter Reed Army Medical Center

6900 Georgia Avenue, NW

Washington, D.C. 20307-5001

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Montgomery County Public Library

Silver Spring Branch

8901 Colesville Road

Silver Spring, MD 20910

# AFFIDAVIT OF PUBLICATION

AD# \_\_\_\_\_

District Of Columbia, ss.  
Personally appeared before me, \_\_\_\_\_  
a Notary Public in and for the District of Columbia

\_\_\_\_\_, who being duly sworn according  
to law, on oath says that he is an AUTHORIZED AGENT of  
NEWS WORLD COMMUNICATIONS, INC., publisher of

## **The Washington Times**

published daily, in the City of Washington, District of Columbia,  
and that the advertisement, of which the annexed is a true copy,  
was published in said newspaper \_\_\_\_\_ times(s) on the following dates:

RECEIVED

JUL 2 1997

CH2M HILL / WDC

at the rate of \_\_\_\_\_ per line.

Total Cost \_\_\_\_\_ Dollars.

*Donna D. Schuf*

Subscribed and sworn to before me

*John Gray*  
19\_\_\_\_\_  
Notary Public

(Seal)

My commission expires \_\_\_\_\_

### **PUBLIC SCOPING MEETING**

#### **Environmental Impact Statement for Reuse by the Army of Property at the Forest Glen Annex of Walter Reed Army Medical Center Montgomery County, Maryland**

The Department of the Army proposes to reuse the property known as the National Park Seminary Historic District, located at the Forest Glen Annex of the Walter Reed Army Medical Center (WRAMC) in Montgomery County, Maryland.

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6900 Georgia Avenue, NW  
Washington, DC 20307-5001

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Montgomery County Library, Silver Spring Branch  
8901 Colesville Road  
Silver Spring, MD 20910

**PUBLIC NOTICE**

**Environmental Impact Statement for Reuse  
by the Army of Property at the Forest Glen  
Annex of Walter Reed Army Medical Center,  
Montgomery County, Maryland**

**This notice is to inform the public that the  
scoping comment period for the subject  
project has been extended an additional 15  
days from July 29, 1997, to August 13,  
1997.**

The Department of the Army proposes to reuse the property known as the National Park Seminary Historic District, located at the Forest Glen Annex of the Walter Reed Army Medical Center (WRAMC) in Montgomery County, Maryland.

In accordance with the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) regulations published at 40 CFR Part 1500, and Army Regulation 200-2, the Department of the Army intends to prepare an Environmental Impact Statement (EIS). The EIS will assess the potential environmental effects associated with a reasonable range of reuse options.

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Written comments may be submitted through **August 13, 1997**, to:

Ben Smith, Public Affairs Officer  
Attn:MCAT-PA (Ben Smith)  
Walter Reed Army Medical Center  
6900 Georgia Avenue, N.W.  
Washington, DC 20307-5001

July 30, 1997

O283564

THE WASHINGTON POST  
Wednesday, 30 July 1997

820 Official Notices

820 Official Notices

**PUBLIC NOTICE**

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Ben Smith, Public Affairs Officer  
Attn: MCAT-PA (Ben Smith)  
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6900 Georgia Avenue, NW  
Washington, DC 20307-5001

THE WASHINGTON TIMES  
Wednesday, 30 July 1997

2950  
Legal Notices

2950  
Legal Notices

### **PUBLIC NOTICE**

#### **Environmental Impact Statement for Reuse by the Army of Property at the Forest Glen Annex of Walter Reed Army Medical Center Montgomery County, Maryland**

This notice is to inform the public that the scoping comment period for the subject project has been extended an additional 15 days from July 29, 1997, to August 13, 1997.

The Department of the Army proposes to reuse the property known as the National Park Seminary Historic District, located at the Forest Glen Annex of the Walter Reed Army Medical Center (WRAMC) in Montgomery County, Maryland.

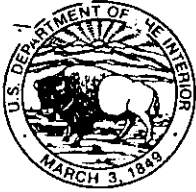
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**Ben Smith, Public Affairs Officer  
Attn: MCAT-PA (Ben Smith)  
Walter Reed Army Medical Center  
6900 Georgia Avenue, NW  
Washington, DC 20307-5001**





# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Chesapeake Bay Field Office  
177 Admiral Cochrane Drive  
Annapolis, MD 21401

July 18, 1997

Mr. Ben M. Smith  
Public Affairs Officer  
Walter Reed Army Medical Center  
Washington, DC 20307-5001

Re: Reuse of Forest Glen Annex of the  
Walter Reed Army Medical Center.  
Montgomery County, MD

Dear Mr. Smith:

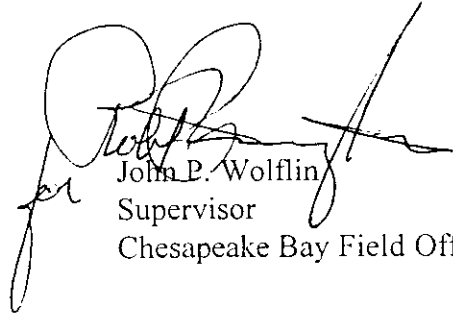
This responds to your June 26, 1997, request for comment of your Notice of Intent to reuse the Forest Glen Annex of the Walter Reed Army Medical Center. We have reviewed the information you enclosed and are providing comments in accordance with Section 7 of the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*).

Except for occasional transient individuals, no Federally listed or proposed endangered or threatened species are known to exist in the project impact area. Therefore, no Biological Assessment or further Section 7 Consultation with the U.S. Fish and Wildlife Service is required. Should project plans change, or if additional information on the distribution of listed or proposed species becomes available, this determination may be reconsidered. This response relates only to endangered species under our jurisdiction. For information on other rare species, you should contact Ms. Lori Byrne of the Maryland Heritage and Biodiversity Conservation Program at (410) 260-8570.

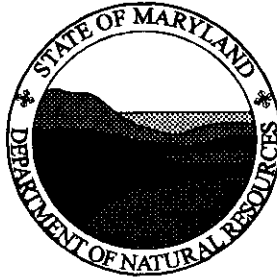
An additional concern of the Service is wetlands protection. Both the Federal and the multi-state Chesapeake Bay Program wetlands policy have the interim goal of no overall net loss of the Basin's remaining wetlands, and the long term goal of increasing the quality and quantity of the Basin's wetlands resource base. Because of this policy and the functions and values wetlands perform, the Service recommends avoiding wetland impacts. All wetlands within the project area should be identified, and if construction in wetlands is proposed, the U.S. Army Corps of Engineers, Baltimore District, should be contacted for permit requirements. They can be reached at (410) 962-3670.

Thank you for your interest in fish and wildlife issues. If you have any questions or need further assistance, please contact Andy Moser at (410) 573-4537.

Sincerely,



John P. Wolflin  
Supervisor  
Chesapeake Bay Field Office



Parris N. Glendening  
*Governor*

**Maryland Department of Natural Resources**  
Forest, Wildlife and Heritage Service  
Tawes State Office Building  
Annapolis, Maryland 21401

John R. Griffin  
*Secretary*

Carolyn D. Davis  
*Deputy Secretary*

December 18, 1997

Ms. Linda Erdmann  
CH2M HILL  
625 Herndon Parkway  
Herndon, VA 20170-5416

**RE: Forest Glen Annex of Walter Reed Army Medical Center, Montgomery County, Maryland**

Dear Ms. Erdmann:

The Wildlife and Heritage Division has no records for Federal or State rare, threatened or endangered plants or animals within this project site. This statement should not be interpreted as meaning that no rare, threatened or endangered species are present. Such species could be present but have not been documented because an adequate survey has not been conducted or because survey results have not been reported to us.

However, the forested area on the project site contains Forest Interior Dwelling Bird habitat. Populations of many Forest Interior Dwelling Bird species (FIDS) are declining in Maryland and throughout the eastern United States. The conservation of this habitat is strongly encouraged by the Department of Natural Resources. The following guidelines will help minimize the project's impacts on FIDS and other native forest plants and wildlife:

1. Concentrate development to nonforested areas.
2. If forest loss or disturbance is absolutely unavoidable, concentrate or restrict development to the perimeter of the forest (i.e., within 300 feet of the existing forest edge), particularly in narrow peninsulas of upland forest less than 300 feet wide.
3. Limit forest removal to the "footprint" of houses and to that which is absolutely necessary for the placement of roads and driveways.
4. Wherever possible, minimize the number and length of driveways and roads.
5. Roads and driveways should be as narrow and short as possible;

preferably less than 25 feet and 15 feet, respectively.

6. Maintain forest canopy closure over roads and driveways.
7. Maintain forest habitat up to the edges of roads and driveways; do not create or maintain mowed grassy berms.
8. Maintain or create wildlife corridors (for details, see Critical Area Commission's Guidance Paper on Wildlife Corridors).
9. Do not remove or disturb forest habitat during May-August, the breeding season for most FIDS. This seasonal restriction may be expanded to February-August if certain early nesting FIDS (e.g., Barred Owl) are present.
10. Afforestation efforts should target (1) riparian or streamside areas that lack woody vegetation, (2) forested riparian areas less than 300 feet, and (3) gaps or peninsulas of nonforested habitat within or adjacent to existing FIDS habitat.

For additional assistance, please contact Mr. David Brinker, Central Regional Manager for the Heritage and Biodiversity Conservation Programs, at 410-744-8939 or 1200 Frederick Road, Catonsville, MD 21228.

Sincerely,

*Michael E. Slattery*  
(MBS)

Michael E. Slattery,  
Director,  
Wildlife & Heritage Division

ER# 97.3054.mo



MARYLAND DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway • Baltimore, Maryland 21224  
(410) 631-3000

Parris N. Glendening  
Governor

Maryland Department of the Environment  
Water Management Administration  
Nontidal Wetlands and Waterways Division  
2500 Broening Highway  
Baltimore, MD 21224  
(410) 631-8094

Jane T. Nishida  
Secretary

August 4, 1997

Ben Smith, Public Affairs Officer  
Attn: MCAT-PA (Ben Smith)  
Walter Reed Army Medical Center  
6900 Georgia Avenue, NW  
Washington, DC 20307-5001

Dear Mr. Smith:

Thank you for your notification of the Department of the Army's intention to reuse the Forest Glen Annex of the Walter Reed Army Medical Center, Montgomery County. The Nontidal Wetlands and Waterways Division (NTWW) provides the following comments regarding the proposed action.

Activities which can potentially affect waterways, wetlands, their 25' buffer and 100 yr floodplain are regulated by the Department and may require authorization from the NTWW. Therefore, it is suggested that the EIS evaluate the potential for such features on the site and describe how they may or may not be affected by proposed activities. The NTWW requires that existing and proposed conditions be depicted relevant to delineated stream channels, wetlands, the 25' buffer to wetlands and the 100 year floodplain. I enclose copies of applicable regulations, fact sheets and an application form for your information.

Thank you for the opportunity to comment. If you have any questions, please contact me at (410) 631-8094.

Sincerely,

Andrew T. Der, Acting Chief  
Southern Region, Nontidal Wetlands and Waterways Division

cc: Terry Clark, Chief, NTWW



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

JUL 15 1997

Mr. Ben Smith  
Public Affairs Officer  
Walter Reed Army Medical Center  
Attn: MCAT-PA (Ben Smith)  
6900 Georgia Avenue, N.W.  
Washington, DC 20307-5001

Re: Environmental Impact Statement for the Reuse of Property by the Department of the Army at the Forest Glen Annex of the Walter Reed Army Medical Center, Montgomery County, Maryland

Dear Mr. Smith:

In accordance with the National Environmental Policy Act (NEPA) of 1969 and Section 309 of the Clean Air Act, we are responding to your request for comments on the referenced project. Below you will find generic as well as specific information that should be included in the proposed Environmental Impact Statement (EIS).

**PURPOSE AND NEED**

Describe the underlying need for the project, including economic, technical, and other reasons for the project.

**ALTERNATIVES ANALYSIS**

As described in the regulations for the Council on Environmental Quality (CEQ) the examination and comparison of the alternatives under consideration is the heart of the environmental document. It is through this comparison that the public is able to make informed decisions with regard to the merits of the project and the advantages and disadvantages of each of the alternatives being studied. Consequently, the CEQ regulations require that the details of each alternative, including the "no action" alternative be clearly presented in a comparative form for easy analysis by the reader. The rationale for the selection of the preferred alternative should be clearly stated in the analysis. For those alternatives that are eliminated from consideration, the reasons for their elimination should be given.

## **LAND USE**

The project area should be described in detail and quantified, specifying the type and acreage of land impacted as well as a description of the existing buildings on the site including their use.

Identify any hazardous wastes that would require disposal prior to alteration in land use, and any hazardous materials that would be used or generated in construction, renovation, demolition or operation. Include or reference a detailed plan for proper disposal.

Discuss any permits required before commencement of the project. This may include a Section 404/Section 10 permit from the Corps of Engineers, state water quality certification, and local construction and zoning permits.

## **ENVIRONMENTAL IMPACTS**

In the EIS, thoroughly describe all environments impacted by the proposed activity including the site and areas outside the site that might be affected directly or indirectly. Include a discussion of the alternation of natural habitat and changes in human use of the area, addressing all of the affected environments. Pay special attention to the following areas:

### **Water Quality**

Existing water bodies and drinking wells in the area should be identified. Plans to develop alternate water supplies for those whose service could be impacted should be explained. Project design should avoid encroaching upon or exposing any groundwater recharge area, if possible. In cases where this is unavoidable, the effects of the encroachment should be addressed. The EIS should discuss stormwater control plans for run-off from buildings and paved areas. Stream crossings should be evaluated and appropriate measures incorporated to minimize impacts.

### **Air Quality**

Air quality analyses should be performed and the results summarized in the EIS. Measures to protect air quality, such as dust control, should be practiced during renovation, demolition and/or construction.

### **Wildlife and Aquatic Biota**

Describe wildlife and aquatic biota in the study area and list rare or endangered plant and animal species. In addition, habitat losses and their effect on wildlife should be documented.

### Wetlands

Wetlands present on, or immediately surrounding the site should be delineated according to the 1989 Federal Manual for Identifying and Delineating Jurisdictional Wetlands. Impacts to wetlands should be avoided or minimized whenever possible. The EIS must analyze the size and functional values of all impacted wetlands and develop a mitigation plan for their replacement.

### Floodplains

Floodplain encroachments must be evaluated and coordinated with the Federal Emergency Management Agency (FEMA).

### Farmland

The document should indicate if any Prime or Unique Farmland, as protected under the Federal Farmland Protection Act, will be impacted.

### Historic Resources

Since the project involves an historic district that is listed on the National Register of Historic Places, it is wise that you plan to consult with the Maryland State Historic Preservation Officer (SHPO) throughout the planning process. The SHPO will work with you to fulfill the requirements of Section 106 of the National Historic Preservation Act.

### Noise Levels

The results of noise studies in the project area should be summarized in the EIS. Noise mitigation measures should be implemented during renovation, demolition and/or construction. These measures may include:

- maintenance of equipment and installation of mufflers to reduce noise;
- time of day restrictions on demolition, construction and/or maintenance activities to eliminate noise during those times of day when it is considered to be most objectionable; and
- timing of demolition and/or construction activities to avoid primary breeding and nesting seasons of avian and other affected species.



### Traffic and Transportation

The EIS should provide an evaluation of existing roads specifying existing levels of service at major intersections near the project area as well as accident data. An evaluation of the impacts associated with an increased number of employees should be provided. The EIS should discuss existing and proposed public transportation to the area under consideration and provide estimates of expected usage. Traffic projections should then be made to show expected conditions for a completed project.

### Socio-economic Impacts

Discuss the socio-economic and cultural status of the area, including the number of people, employees and/or jobs impacted as a result of the proposed project. The EIS should address the decrease or increase of people/employees/jobs in relation to its effect on tax base, local housing, job markets, schools, utilities, businesses, etc.

## **POLLUTION PREVENTION/CONSERVATION**

Pollution prevention and water and energy conservation practices should be incorporated as definite project features. It is suggested that if the buildings within the historic district are renovated that innovative pollution prevention strategies and conservation methods be incorporated into the design of these facilities.

### Pollution Prevention

- Non-toxic paints, stains, exterior preservatives, and chemical-free carpeting should be used and specified. This can reduce long-term costs for removal of potentially hazardous materials and provide better air quality.

- Recycling of materials (i.e., paper, cardboard, aluminium and plastics) should be encouraged and stations designed into renovated buildings. Collecting recyclable materials is only part of the recycling process. Procurement of recycled goods is also necessary and helps to stimulate markets. As a consumer and purchaser of goods and services, Walter Reed Army Medical Center is encouraged to make purchasing decisions with this in mind if it is to retain ownership and use of the referenced property.

### Water Conservation

- Grounds should be landscaped with hardy native plant species to cut down on watering and lessen the need for pesticides and fertilizers. Liberal and judicious use of trees can help to reduce heating and cooling costs and act as air purifiers.

- To ensure adequate supply and quality of water, monitoring of the water table and chemical testing of the water can be conducted.

- Low-flow toilets should be installed in renovated buildings, where feasible.

#### Energy Conservation

- Energy-efficient heating and cooling systems, proper building insulation, and the use of energy-efficient lighting can be incorporated in the design of renovated facilities to reduce cumulative impacts of energy consumption and encourage energy conservation. For example, take advantage of natural ventilation as well as using compact fluorescent lamps which consume considerably less electricity than do incandescent ones and last much longer.

- Install energy efficient windows and doors (for example, reflective glass).

Thank you for the opportunity to participate in this early coordination effort of the scoping process. I look forward to reviewing the EIS. If you have questions, please feel free to contact me at 215-566-2765.

Sincerely,



Karen Del Grosso  
Environmental Programs Branch



July 23, 1997

Mr. Ben Smith  
Public Affairs Officer  
Walter Reed Army Medical Center  
Attn: MCAT-PA (Ben Smith)  
6900 Georgia Avenue, NW  
Washington, DC 20307-5001

SUBJECT: Environmental Impact Statement for the Reuse of  
Property by the Department of the Army at the Forest Glen Annex  
of the Walter Reed Army Medical Center, Montgomery County,  
Maryland.

Dear Mr. Smith:

This site contains only a few acres of soils that qualify as  
prime farmland and/or soils of statewide concern. However, due  
to the location of the project (within an already built-up area  
of Montgomery County), and due to the fact that this site is  
already developed, the Farmland Protection Policy Act does not  
apply.

Thank you for the opportunity to comment.

Sincerely,

J. G. Warfield  
District Conservationist

JGW/bjb



Parris N. Glendening, Governor  
Patricia J. Payne, Secretary

August 5, 1997

Office of Preservation Services

Mr. Ben M. Smith  
Public Affairs Officer  
Walter Reed Army Medical Center  
ATTN: MCAT-PA (Ben Smith)  
6900 Georgia Avenue, N.W.  
Washington, D.C. 20307-5001

RE: WRAMC-FG EIS


Dear Mr. Smith:

We understand that the Army is undertaking an environmental impact statement for the future of the National Park Seminary. The Trust appreciates this opportunity to comment. As you are well aware, the Trust is happy to consult with the Army and the Advisory Council on Historic Preservation to fulfill compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. This office strongly encourages the Army to facilitate the Section 106 process by developing the appropriate Section 106 documentation through the EIS process.

Toward this end, we recommend that the Army approach its five alternatives from the strongest preservation option to the weakest and seek solutions for each. The strongest preservation approach is obviously rehabilitation of the site, demolition the weakest. Reuse and rehabilitation of the historic property could come from the Army or the development community. It would behoove the Army to circulate a request for proposal for the reuse of the property. By marketing the historic district, the Army may receive a viable adaptive reuse scheme. The strongest preservation approach has the fewest, if any, adverse effects.

The five alternatives to be studied in the EIS seem contradictory. Some options would result in significant adverse effects to the historic district. Others may remain ambiguous until further details are developed. As stated in previous correspondences, the Trust strongly encourages the Army to reuse and rehabilitate this distinctive historic property, through private sector ownership or your own redevelopment. The Trust believes that the Programmatic Agreement can provide an appropriate vehicle to address the diverse elements of this complex undertaking. We look forward to working with you and the Council to develop a mutually-satisfying solution for the future of the National Park Seminary, in compliance with Section 106.

Sincerely,

  
Lauren L. Bowlm  
Preservation Officer

LLB/llb/9701852

cc: Ms. MaryAnn Naber



Division of Historical and Cultural Programs  
100 Community Place • Crownsville, Maryland 21032 • (410) 514-7637  
*The Maryland Department of Housing and Community Development (DHCD) pledges to foster the letter and spirit of the law for achieving equal housing opportunity in Maryland.*



# Advisory Council On Historic Preservation

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The Old Post Office Building  
1100 Pennsylvania Avenue, NW, #809  
Washington, DC 20004

---

JUL 24 1997

Mr. Ben M. Smith  
Public Affairs Officer  
Department of the Army  
Walter Reed Army Medical Center  
Washington, DC 20307-5001

REF: Proposed Reuse of Forest Glen Annex  
Environmental Impact Statement  
Montgomery County, Maryland

Dear Mr. Smith:

On July 2, 1997, the Council received your notification regarding preparation of an Environmental Impact Statement for the referenced project. While we appreciate the opportunity to participate in initial agency coordination, it is not the Council's role, nor do we have the resources to serve in that capacity. Section 106 of the National Historic Preservation Act and the Council's implementing regulations (36 CFR Part 800) set forth the steps to be taken in order to identify historic properties and assess effects associated with a proposed undertaking. Once it is determined that the project may affect historic properties, the Council should be notified and given the opportunity to participate in further consultation to consider means to avoid or minimize those impacts. We recommend that you also initiate coordination with the Maryland State Historic Preservation Office early in the scoping process and work closely with them to take advantage of their expertise in dealing with cultural resources in the area. Any further request for the Council's comments regarding this undertaking should be initiated by the Department of the Army, as the sponsoring Federal agency, and accompanied by requisite supporting documentation pursuant to 36 CFR Part 800.

Should you have further questions regarding the Section 106 process, please feel free to contact me at (202) 606-8534.

Sincerely,



MaryAnn Naber  
Office of Planning and Review

# NATIONAL CAPITAL PLANNING COMMISSION

## COMMISSION MEMBERS

Appointed by the  
President of the United States

Harvey B. Gantt  
CHAIRMAN

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Margaret G. Vanderhye

Appointed by the  
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Governmental Affairs  
United States Senate  
Honorable Fred Thompson

Chairman, Committee on  
Government Reform and Oversight  
U.S. House of Representatives  
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Mayor, District of Columbia  
Honorable Marion S. Barry, Jr.

Chairman, Council of the  
District of Columbia  
Honorable Linda W. Cropp (Actg.)

EXECUTIVE DIRECTOR  
Reginald W. Griffith

IN REPLY REFER TO:  
NCPC File Nos. 1200 and 5758

AUG 07 1997

Mr. Ben Smith  
Public Affairs Officer  
Walter Reed Army Medical Center  
Attn: MCAT-PA (Ben Smith)  
6900 Georgia Avenue, N.W.  
Washington, D.C. 20307-5001

Dear Mr. Smith:

Thank you for the opportunity to identify issues that we believe should be addressed in the Environmental Impact Statement (EIS) for the Reuse of Property by the Department of the Army at the Forest Glen Annex of the Walter Reed Army Medical Center, in Montgomery County, Maryland. We hope our comments will assist you in preparing the EIS.

There are a number of items the Draft EIS should address. The EIS should describe the historical significance of the site and evaluate the potential impact of each alternative on the significance of the site and buildings. Thorough evaluation of each alternative is essential to determining each reuse option's conformance with the National Historic Preservation Act (NHPA). Like the National Environmental Policy Act (NEPA), which is the basis for preparing the EIS, NHPA requires applicants to thoroughly evaluate alternatives. As you may know, the requirements of both NEPA and NHPA should be met concurrently, where possible, so that agency decisionmaking can occur in an appropriate and prompt manner.

We note that the alternative involving excessing, disposal, and sale of the site at fair market value to a private entity excludes the possibility of a public entity (i.e., Federal or local government agency, non-profit institution) or a public-private affiliation purchasing or developing the site. We believe this is unnecessarily restrictive. Therefore, we recommend that the excessing, disposal, and sale option be modified to either include public entities or that the Army consider including a sixth alternative involving reuse by public entities. We also believe the study boundaries for various subjects addressed in the EIS (e.g., land use, transportation, cultural resources) should be explained in the document.

Mr. Ben Smith  
Page Two

Furthermore, commitments made by the Army or others based upon the Memorandum of Understanding of March 18, 1992, the March 17, 1992 letter from General Cameron to Gus Bauman, the 1991 Master Plan, and other documents should be summarized in the EIS. An analysis of each alternatives' conformance with the commitments would be useful for staff review of potential impacts. Furthermore, an analysis of pertinent studies would assist staff review. An example of such a study is the 1973 National Park Seminary Site Preservation Feasibility Study conducted by staff of this Commission, WRAMC, Maryland-National Capital Park and Planning Commission (M-NCPPC), and the Maryland Historical Trust, among others.

Coordination with governmental agencies and non-governmental organizations should be discussed. The EIS should describe the types of consultation and outreach efforts undertaken with respect to the M-NCPPC, the Montgomery County Parks Department, the Maryland Historical Trust, nearby residential communities, and interest groups such as Save Our Seminary and the National Trust for Historic Preservation. Noting the results of such efforts, including tentative or executed agreements, would better help staff understand issues and concerns expressed by various interested parties.

In addition, the EIS should examine issues with potential off-site, as well as on-site, impacts. Traffic scenarios involving alternative vehicular and pedestrian circulation changes would help in conveying the potential transportation effects related to each alternative. The EIS should also compare these scenarios with the Circulation Plan contained in the Army's 1991 Master Plan. Indicating levels-of-service and the potential for queues would aid evaluation of vehicular traffic impacts. Furthermore, required traffic improvements, the phasing of such improvements, and the agency responsible for the work should be part of the transportation analysis, in addition to a discussion of pedestrian safety and convenience. Finally, if the Army ultimately retains control of the site, it is advised it might have to prepare a Transportation Management Plan (TMP) incorporating goals for trip reduction and descriptions of monitoring and mitigation measures.

Other off-site impacts of concern to us relate to effects on neighborhood character and property values. Potential private or public-private development could affect local residential density or use intensity (e.g., mixed use, commercial) and indirectly harm the character of existing residential neighborhoods. Such detrimental effects

Mr. Ben Smith  
Page Three

could result from the siting of incompatible land uses, increased traffic, and diminished aesthetics. The EIS should assess the effects of each alternative on property values, including changes in current and projected property values. Factors that could affect values include visual impacts, noise, and a perception of lessened pedestrian and vehicular safety.

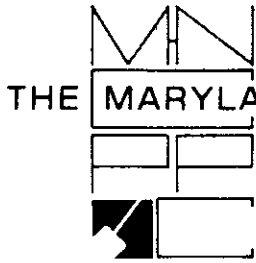
In addition, we suggest that the EIS assess solid and hazardous waste, building security and Comprehensive Plan issues. The document should indicate if soil or building contamination exists. If contamination exists, then mitigation measures should be noted and any potential off-site impacts evaluated. The EIS should cite applicable land use and development policies and evaluate each alternatives' conformance or conflict with these policies. As always, we are available to meet with the Army to discuss the policies, if needed.

We appreciate your continued consultation with the Commission. If you have any questions about our comments, please call Maurice Foushee, our Environmental Affairs Officer, at (202) 482-7256.

Sincerely,

  
Reginald W. Griffith  
Executive Director





THE MARYLAND-NATIONAL CAPITAL PARK AND PLANNING COMMISSION  
8787 Georgia Avenue • Silver Spring, Maryland 20910-3760

(301) 495-4605

Montgomery County Planning Board  
Office of the Chairman

August 13, 1997

Ben Smith, Public Affairs Officer  
Attn: MCAT-PA (Ben Smith)  
Walter Reed Army Medical Center  
6900 Georgia Avenue, N. W.  
Washington, D.C. 20307-5001

Dear Mr. Smith:

This letter is a follow-up to the oral testimony that was presented by Maryland-National Capital Park and Planning Commission (M-NCPPC) staff on July 14, 1997, at the public scoping meeting on the EIS for Reuse of the National Park Seminary Historic District.

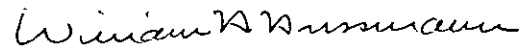
As stated by our staff, M-NCPPC is very concerned about the condition of the buildings in the National Park Seminary Historic District. Despite written commitments to the Montgomery County Planning Board by the Department of the Army in 1992 to keep these buildings occupied and to attempt to find funds for their renovation, no action has taken place to preserve or significantly stabilize the historic buildings. In addition, in 1973 and again in 1992, the Department of the Army committed to declaring the historic district as surplus so that another public or private entity could potentially undertake the renovation and reuse of the historic buildings. Only now is an EIS being undertaken and only one of the alternatives considers disposition of the historic district.

In reviewing the alternatives proposed for study in the EIS, only two seem to conform with the Department of the Army's earlier commitments to the Planning Board: the alternative that calls for disposal to a group or entity that will undertake the rehabilitation, or total rehabilitation of the historic structures by the Army. The other alternatives are directly in conflict with the commitments made by the Army in 1992.

For your reference, I have attached a copy of the M-NCPPC staff's testimony of July 14, 1997. This testimony more fully reflects the concerns of the Montgomery County Planning Board, including the stated need to carefully study transportation, environmental, and land use impacts as part of the EIS.

The Montgomery County Planning Board feels that the National Park Seminary is one of the most unique and important historic resources in this area. It is essential that action be taken immediately to stabilize and rehabilitate the historic structures or they will be lost to future generations of county residents.

Sincerely,



William H. Hussmann

cc: The Honorable Paul Sarbanes, U.S. Congress  
The Honorable Connie Morella, U.S. Congress  
The Honorable Ida G. Ruben, Senate of Maryland  
Rodney Irwin, Director, Department of Park and Planning  
✓ Virginia Farris, CH2M Hill  
Montgomery County Council Members  
Bonnie Rosenthal, President, SOS

My name is Bob Spalding and this is Gwen Wright. We are staff in the Montgomery County Department of Park and Planning - I am the planner for North Silver Spring and Ms. Wright is the Historic Preservation Coordinator. Thank you for the opportunity to offer comments on the Notice of Intent to Prepare an EIS on the National Park Seminary Historic District.

An update of the comprehensive area master plan for North Silver Spring, which includes the National Park Seminary Historic District as well as the rest of the WRAMC Forest Glen Annex, is just beginning. Issues of major concern in this master plan effort will be land use plans, traffic and transportation matters, environmental protection, and historic preservation.

The proposed EIS on the National Park Seminary Historic District touches on all of these issues and we would like to work closely with the Army as they undertake this process.

We are particularly concerned that changes in use are compatible with the character of the surrounding single-family neighborhoods and about traffic impacts on the quality of life in the neighborhoods. In addition, environmental issues on this site are particularly sensitive and must be treated with a great deal of care.

Finally, preservation of the historic structures in the National Park Seminary Historic District is a major concern and priority. These buildings are very important to the history of the County and to the character of North Silver Spring. I will now turn to Ms. Wright for her comments on the specific alternatives proposed.

Thank you. Before commenting on the various alternatives to be considered, it is important to remember the more recent history of this property. Since the Army took possession of the National Park Seminary Historic District in the 1940s, they have used the historic buildings for medical and military purposes but have done little to maintain or preserve the wonderful architecture in the district. In 1973, a Feasibility Study was undertaken by M-NCPPC in conjunction with the Army, NCPC, the community, and various State representatives. The study was predicated on the stated goal of the Army to close the facility by 1977, as they were building new buildings for their medical purposes elsewhere. The outcome of that feasibility study was a recommendation that "...the National Park Seminary preservation program should become a model for careful long-range planning to locate a new owner and/or activity for a historic site and to insure its continued maintenance and care."

In 1992, Walter Reed completed a master plan for the Forest Glen Annex. During the course of negotiations on this master plan, Major General Richard D. Cameron - Commanding Officer at Walter Reed - made numerous written commitments to the Montgomery County Planning Board in order to gain their support for the new WRAIR building. These commitments included continuing "...to request funding for maintenance of the Historic District and mak[ing] every effort to halt the deterioration of these structures..." In addition, General Cameron committed to keep 112 and 115 occupied and well-maintained. He claimed that the Army was arranging to lease the Pagoda to Save Our Seminary. Finally, he clearly moved toward immediate disposal of the historic district in his written statement "WRAMC will negotiate with future owners of the Historic District, which I have requested be declared excess by the Army..."

In 1995, another feasibility study was completed - again with the participation of M-NCPPC, the community, State representatives, etc. - and this study was also predicated on the concept that the Army would be initiating "...the surplus disposition process for a major portion of the National Park Seminary Historic District..." - as stated on page 1 of the study.

All in all, nearly 25 years have passed since the Army first stated that they would dispose of the National Park Seminary Historic District and still the buildings languish - unused, neglected, falling apart. It is time for the Army to fulfill their commitments - all their commitments.

For this reason, the only acceptable alternatives listed in the Notice of Intent are "d" or "e" - total rehabilitation and reuse by the Army or disposal to a private group or entity that will undertake the rehabilitation. The other three alternatives - no action, total demolition, and partial demolition - can not be endorsed. We are also very concerned about the Army's sudden decision, also mentioned in the Notice of Intent, that they no longer wish to dispose of the historic district. As can be seen from the information provided previously, this is a major change in policy and we would like a better understanding of how and why this position was developed.

Whatever the process that continues from this point on, it is important to coordinate with the Montgomery County Department of Park and Planning - we would like specific notification of all future meetings and hearings on this issue. We are an interested and involved party and want to monitor this effort closely. Again thank you for the opportunity to make these comments.



MARYLAND DEPARTMENT OF THE ENVIRONMENT  
2500 Broening Highway • Baltimore, Maryland 21224  
(410) 631-3000

Parris N. Glendening  
Governor

Jane T. Nishida  
Secretary

July 28, 1997

Mr. Ben Smith  
Public Affairs officer  
Walter Reed Army Medical Center  
Attn: MCAT-PA (Ben Smith)  
6900 Georgia Avenue, N.W.  
Washington DC 20307-5001

Dear Mr. Smith:

Governor Glendening and Secretary Jane Nishida received your recent letters regarding the Environmental Impact Statement for the Reuse of Property at the Forest Glen Annex of Walter Reed, and asked that I respond to you directly.

Maryland Department of the Environment (MDE) has reviewed the material that was sent to us. Various Administrations within MDE are responsible for air, water and solid waste. They have found your materials to be consistent with MDE's plans, programs and objectives. Your materials are also being reviewed through the state-wide Clearinghouse process, which includes other state agencies.

To assist in your future planning activities, I have enclosed some routine comments provided by MDE's Air and Radiation Management and Waste Management Administrations. You will find that these comments can serve as a partial checklist, and as a source of contacts and phone numbers. If you have any other questions, please do not hesitate to contact a member of my staff Mr. Jim George at (410) 631-3579.

Sincerely,

Michael S. Haire, Director  
Technical and Regulatory Services Administration

MSH/law  
Enclosure

cc: The Honorable Parris N. Glendening  
Jane T. Nishida, Secretary, Maryland Department of the Environment  
Mr. Jim George, Technical and Regulatory Services Administration

## **Comments from the Air and Radiation Management Administration:**

This project is consistent with our plans, programs, and objectives.

*(The following list omits those elements, which are not relevant)*

1. If the applicant suspects that asbestos is present in any portion of the structure that will be renovated/demolished, then the applicant should contact Mr. Frank Whitehead, Community Environmental Services Program, Air and Radiation Management Administration at (410) 631-3215 to learn about the State's requirements for asbestos handling.
2. Construction, renovation and/or demolition of buildings and roadways must be performed in conformance with State regulations pertaining to "Particulate Matter from Materials Handling and Construction" (COMAR 26.11.06.03D), requiring that during any construction and/or demolition work, reasonable precaution must be taken to prevent particulate matter, such as fugitive dust, from becoming airborne.
3. If boilers or other equipment capable of producing emissions are installed as a result of this project, the applicant is requested to obtain a permit to construct from MDE's Air and Radiation Management Administration for this equipment, unless the applicant determines that a permit for this equipment is not required under State regulations pertaining to "Permits, Approvals, and Registration" (COMAR 26.11.02.). A review for toxic air pollutants should be performed. Please contact Dr. Justin Hsu, Ph.D., P.E., New Source Permits Division, Air and Radiation Management Administration at (410) 631-3230 to learn about the State's requirements and the permitting processes for such devices.

### **-SOIL REMEDIATION STATEMENT (STAND ALONE)-**

5. If soil contamination is present, a permit for soil remediation is required from MDE's Air and Radiation Management Administration. Please contact Dr. Justin Hsu, Ph.D., P.E., New Source Permits Division, Air and Radiation Management Administration at (410) 631-3230 to learn about the State's requirements for these permits.

### **-LICENSE REQUIRED FOR RADIOACTIVE MATERIALS, ETC.-**

7. All x-ray machines in the State of Maryland must be registered. Please contact Mr. Thomas Ferguson, X-Ray Section, Air and Radiation Management Administration at (410) 631-3300 for additional information. Any person or institution that wants to acquire radioactive materials is required to possess a license. Please contact Mr. Carl Trump, Jr., Radioactive Materials Licensing Section, Air and Radiation Management Administration at (410) 631-3300 for additional information.

- ENERGY EFFICIENCY -

10. Fossil fuel fired power plants emit large quantities of sulfur oxide and nitrogen oxides, which cause acid rain. In addition, nitrogen oxide emissions contribute to the problem of global warming and also combine with volatile organic compounds to form smog. The MDE supports energy conservation, which reduces the demand for electricity and therefore, reduces overall emissions of harmful air pollutants. For these reasons, MDE recommends that the builders use energy efficient lighting, computers, insulation and any other energy efficient equipment. Contact the U.S. EPA at (202) 233-9120 to learn more about the voluntary Green Lights Program which encourages businesses to install energy-efficient lighting systems.

-USE OF ASPHALT-

11. The applicant should be advised that no cutback asphalt should be used during the months of June, July and August.
14. Project should support resource conservation and pollution prevention through land use and transportation designs that provide alternatives to single occupant vehicle use.

# **WASTE MANAGEMENT ADMINISTRATION RESPONSE TO CLEARINGHOUSE PROJECTS AND SECRETARY'S REFERRAL DOCUMENTS**

**Project Review SAI #/Location: ES 97-0707-0031 MONTGOMERY COUNTY**

**Received in WAS: 7/9/97**

**Due Date to OSPP: 7/21/97**

**Date Sent to OSPP: 7/17/97**

**Referral from Secretary:**

Consistent with the following comments and response statements:

Any above ground or underground petroleum tanks which may be utilized must be installed and maintained in accordance with applicable State and federal laws and regulations. Contact the Oil Control Program at (410) 631-3442 for additional information.

Underground storage tanks must be registered and installation or removal must be conducted and performed by a contractor certified to install/remove underground storage tanks by the Waste Management Administration in accordance with Oil Pollution and Tank Management, COMAR 26.10. Contact the Oil Control Program at (410) 631-3442 for additional information.

Any solid waste, including construction, demolition and land clearing debris, generated from the subject project, must be disposed of at a permitted solid waste acceptance facility or recycled if possible. Contact the Solid Waste Program at (410) 631-3318 for additional information.

The Hazardous Waste Program should be contacted directly at (410) 631-3343 by those facilities which generate, handle or propose to generate or handle hazardous wastes to ensure these activities are being conducted in compliance with applicable State and federal laws and regulations.

The Hazardous Waste Program should be contacted directly at (410) 631-3343 prior to construction activities to ensure that treatment, storage or disposal of hazardous wastes and low-level radioactive wastes at the facility will be conducted in compliance with applicable State and federal laws and regulations.





**Maryland Department of Transportation**

**The Secretary's Office**

**Parris N. Glendening**  
Governor

**David L. Winstead**  
Secretary

**John D. Porcari**  
Deputy Secretary

July 22, 1997

Mr. Ben M. Smith  
Public Affairs Officer  
Walter Reed Army Medical Center  
ATTN: MCAT-PA (Ben Smith)  
6900 Georgia Avenue, N.W.  
Washington DC 20307-5001

Dear Mr. Smith:

Thank you for your recent letter regarding the reuse of the National Park Seminary Historic District property. The Maryland Department of Transportation looks forward to reviewing the Draft and Final Environmental Impact Statements (DEIS and FEIS) when they are available. The State has a process in place for review of planning documents such as the DEIS and FEIS for the proposed project. When the document is received by the Clearinghouse at the Maryland Office of Planning (MOP), it will be distributed to interested departments within State government for comment. All comments will be consolidated and forwarded to you. The address for the MOP is 301 W. Preston Street, Baltimore Maryland 21201-2365.

Again, thank you for your letter. If you need further assistance, please feel free to call Mr. Fred Rappe, Director of Systems Planning and Evaluation, who may be reached at (410) 865-1276.

Sincerely,

David L. Winstead  
Secretary

cc: Mr. Ronald M. Kreitner, Director, Maryland Office of Planning  
Mr. Fred Rappe, Director, Office of Systems Planning and Evaluation, Maryland  
Department of Transportation  
Mr. Parker F. Williams, Administrator, State Highway Administration

My telephone number is (410)- 865-1000

TTY For the Deaf: (410) 865-1342

Post Office Box 8755, Baltimore-Washington International Airport, Maryland 21240-0755



DEPARTMENT OF DEFENSE

DEPARTMENT OF THE ARMY

NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT  
STATEMENT (EIS) ON THE NATIONAL PARK SEMINARY HISTORIC  
DISTRICT (NPSHD) LOCATED AT THE WALTER REED ARMY MEDICAL  
CENTER (WRAMC)

AGENCY: Walter Reed Army Medical Center, Department of the  
Army

ACTION: Notice of Intent

SUMMARY: The Army intends to prepare an EIS to assist it in  
deciding upon a plan of action for the NPSHD. The NPSHD,  
Forest Glen Annex, is located within the Forest Glen area of  
Montgomery County, Maryland, approximately 1.5 miles north  
of the District of Columbia. The Annex is bounded by the  
Capital Beltway (I-495) to the north, Rock Creek Park to the  
west, Brookville Road to the south, and the main line of the  
CSX Rail System to the east.

The NPSHD consists of a 26-acre parcel containing 24  
buildings, which has been listed as a historic district on  
the National Register of Historic Places since 1972 and the  
Montgomery County Master Plan for historic preservation  
since 1991. The NPSHD is located on the north end of Forest

Glen Annex and is bounded by the Capital Beltway (I-495) to the north, Smith Drive on the east, and Linden Lane to the south and west. The NPSHD is comprised of a collection of late 19th and early 20th century architecturally eclectic buildings and structures associated with a land development company and later with a private finishing school. The Army, after acquisition in 1942, utilized the property and its improvements as a convalescent center through the late 1970's.

Since that time, Walter Reed Army Medical Center has utilized the NPSHD for administrative and logistical purposes such as offices and storage. In 1991, WRAMC determined that the NPSHD was excess to its needs. A recent review by Walter Reed Army Medical Center has revealed that retention of the real property comprising Forest Glen Annex, in its entirety, is necessary to meet mission requirements.

Consistent with its obligations under the National Environmental Policy Act, 42 U.S.C. 4321 et seq.; the regulations published by the Council on Environmental Quality, 40 CFR Part 1500-1508; and Army Regulation 200-2, the U.S. Army intends to prepare an EIS to assist it in deciding on a plan for the reuse and/or disposal of the

NPSHD. The purpose of the statement is to ensure that the U.S. Army makes an informed decision, based on full and informed public participation. The EIS will identify all relevant direct, indirect and cumulative environmental impacts associated with the alternatives considered.

**ALTERNATIVES:** The range of alternatives will address a series of options for reuse and/or disposal of the land and the buildings, structures and facilities within the NPSHD. Alternatives to be considered include the following:

a. No Action. The property would remain in caretaker status with the Department of the Army. Minimal maintenance and repairs would be accomplished.

b. Complete demolition of buildings. The Army would document the historical significance of the structures through detailed photographs and drawings as required under a Memorandum of Agreement negotiated between the Army, the Maryland Historical Trust, and the Advisory Council on Historic Preservation. Upon completion of the required documentation, the buildings would be torn down and the land retained by Walter Reed Army Medical Center.

c. Partial demolition of buildings and reuse of remaining rehabilitated structures. The buildings that

would be torn down would be documented as described above. Remaining buildings would be rehabilitated and reutilized as described in the EIS.

d. Complete rehabilitation of all structures. All structures located within the historic district will be rehabilitated for future use.

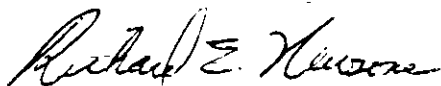
e. Excess, disposal, and sale at fair market value to a private entity.

**SCOPING:** This notice shall initiate a period of public scoping that is intended to invite the participation of all interested members of the public as well as other public agencies. Comments received during the scoping period will be used to assist the Army in identifying significant issues of public concern regarding potential impacts on the quality of the human environment. The scoping period will be followed by development of a reasonable range of reuse alternatives to be incorporated in a draft EIS. The draft EIS will be published and made available for public review and comment prior to its finalization. After review of the draft EIS, the U.S. Army will address public comments in a final EIS that will be released for additional review prior to publication of a Record of Decision (ROD). The ROD will

identify the action chosen for implementation. Interested members of the public may be precluded from challenging the adequacy of the final EIS if they fail to participate in the process in a meaningful manner.

The Army will arrange a public scoping meeting within 30 days of the publication of this Notice of Intent at a place and time to be announced in the legal sections of the "Washington Post," "Washington Times," and "Montgomery Journal" newspapers. Interested members of the public are invited to provide written comments to Mr. Ben Smith at Walter Reed Army Medical Center, ATTN: MCAT-PA (Ben Smith), 6900 Georgia Avenue, NW, Washington, DC 20307-5001 no later than 15 days following the public scoping meeting.

**FOR FURTHER INFORMATION:** Please contact Mr. Ben Smith, Public Affairs Officer, Walter Reed Army Medical Center, at (202) 782-7177.



Richard E. Newsome  
Acting Deputy Assistant Secretary of the Army  
(Environment, Safety and Occupational Health)  
OASA(I,L&E)

# THE Journal NEWSPAPERS

THE ARLINGTON JOURNAL  
THE ALEXANDRIA JOURNAL  
THE FAIRFAX JOURNAL  
THE MONTGOMERY JOURNAL  
THE PRINCE GEORGE'S JOURNAL  
THE PRINCE WILLIAM JOURNAL

## PROOF OF PUBLICATION

I, Ryan E. Phillips, Publisher  
of the  
MONTGOMERY JOURNAL  
a newspaper in the County/City  
of ROCKVILLE, MD  
published in the English lan-  
guage, and having a bona fide  
list of paid subscribers lo-  
cated in the aforementioned  
County/City, and entered as  
second class matter under the  
Postal Laws and Regulations of  
the United States of America  
for 52 successive weeks or  
more prior to the issue of  
6/04/1997,  
certify that the notice of  
NOTICE OF INTENT  
for  
CH2M HILL  
attached hereto has been pub-  
lished in said newspaper  
1  
time for 1 issue  
consecutive, commencing with  
the issue of 6/04/1997

  
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RYAN E. PHILLIPS

Sworn to and subscribed before  
me this 4TH day of JUNE, 1997.

  
-----  
Notary Public

My commission expires:

FEB 28 2001  
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Ad Number: 271431/271823

Run Date: 6/04/1997

VIRGINIA FARRIS

2720 Prosperity Avenue • Fairfax, VA 22034-1000 • (703

### NOTICE OF INTENT TO PREPARE AN ENVI- RONMENTAL IMPACT STATEMENT (EIS) ON THE NATIONAL PARK SEMINARY HISTORIC DISTRICT (NPSHD) LOCATED AT THE WALTER REED ARMY MEDICAL CENTER (WRAMC).

**AGENCY:** Walter Reed Army Medical Center, Depart-  
ment of the Army.

**ACTION:** Notice of Intent

**SUMMARY:** The Army intends to prepare an EIS to  
assist it in deciding upon a plan of action for the  
NPSHD. The NPSHD, Forest Glen Annex, is located  
within the Forest Glen area of Montgomery County,  
Maryland, approximately 1.5 miles north of the District  
of Columbia. The Annex is bounded by the Capital  
Beltway (I-495) to the north, Rock Creek Park to the  
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the CSX Rail System to the east.

The NPSHD consists of a 26 acre parcel containing  
24 buildings, which has been listed as an historic dis-  
trict on the National Register of Historic Places since  
1972 and the Montgomery County Master Plan for his-  
toric preservation since 1991. The NPSHD is located  
on the north end of Forest Glen Annex and is bounded  
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on the east, and Linden Lane to the south and west. The  
NPSHD is comprised of a collection of late 19th and  
early 20th century, architecturally eclectic, buildings  
and structures associated with a land development  
company and later with a private finishing school. The  
Army, after acquisition in 1942, utilized the property  
and its improvements as a convalescent center through  
the late 1970s.

Since that time, Walter Reed Army Medical Center  
has utilized the NPSHD for administrative and logis-  
tical purposes such as offices and storage. In 1991,  
WRAMC determined that the NPSHD was excess to its  
needs. A recent review by Walter Reed Army Medical  
Center has revealed that retention of the real property  
comprising Forest Glen Annex, in its entirety, is neces-  
sary to meet mission requirements.

Consistent with its obligations under the National  
Environmental Policy Act, 42 U.S.C. 4321 et seq.; the  
regulations published by the Council on Environmental  
Quality, 40 CFR Part 1500-1508; and Army Regula-  
tion 200-2, the U.S. Army intends to prepare an EIS to  
assist it in deciding on a plan for the reuse and/or  
disposal of the NPSHD. The purpose of the statement is  
to ensure that the U.S. Army makes an informed deci-  
sion, based on full and informed public participation.  
The EIS will identify all relevant direct, indirect and cu-  
mulative environmental impacts associated with the  
alternatives considered.

**ALTERNATIVES:** The range of alternatives will ad-  
dress a series of options for reuse and/or disposal of  
the land on the buildings, structures and facilities within  
the NPSHD. Alternatives to be considered include the  
following:

a. No Action. The property would remain in caretaker  
status with the Department of the Army. Minimal main-  
tenance and repairs would be accomplished.

b. Complete demolition of buildings. The Army would  
document the historical significance of the structures  
through detailed photographs and drawings as re-  
quired under a Memorandum of Agreement between  
the Army, the Maryland Historical Trust, and the  
Advisory Council on Historic Preservation. Upon com-  
pletion of the required documentation, the buildings  
would be torn down and the land retained by Walter  
Reed Army Medical Center.

c. Partial demolition of buildings and reuse of re-  
maining rehabilitated structures. The buildings that  
would be torn down would be documented as de-  
scribed above. Remaining buildings would be rehabi-  
litated and reutilized as described in the EIS.

d. Complete rehabilitation of all structures. All struc-  
tures located within the historic district will be rehabi-  
litated for future use.

e. Excess, disposal, and sale at fair market value to  
a private entity.

second class matter under the Postal Laws and Regulations of the United States of America for 52 successive weeks or more prior to the issue of 6/04/1997,

certify that the notice of NOTICE OF INTENT

for

CH2M HILL

attached hereto has been published in said newspaper

1

time for 1 issue

consecutive, commencing with the issue of 6/04/1997

*Ryan E. Phillips*

RYAN E. PHILLIPS

Sworn to and subscribed before me this 4TH day of JUNE, 1997.

*[Signature]*

Notary Public

My commission expires:

FEB 28 2001

Ad Number: 271431/271823

Run Date: 6/04/1997

VIRGINIA FARRIS

2720 Prosperity Avenue • Fairfax, VA 22034-1000 • (703)

district on the National Register of Historic Places since 1972 and the Montgomery County Master Plan for historic preservation since 1991. The NPSHD is located on the north end of Forest Glen Annex and is bounded by the Capital Beltway (I-495) to the north, Smith Drive on the east, and Linden Lane to the south and west. The NPSHD is comprised of a collection of late 19th and early 20th century, architecturally eclectic, buildings and structures associated with a land development company and later with a private finishing school. The Army, after acquisition in 1942, utilized the property and its improvements as a convalescent center through the late 1970s.

Since that time, Walter Reed Army Medical Center has utilized the NPSHD for administrative and logistical purposes such as offices and storage. In 1991, WRAMC determined that the NPSHD was excess to its needs. A recent review by Walter Reed Army Medical Center has revealed that retention of the real property comprising Forest Glen Annex, in its entirety, is necessary to meet mission requirements.

Consistent with its obligations under the National Environmental Policy Act, 42 U.S.C. 4321 et seq.; the regulations published by the Council on Environmental Quality, 40 CFR Part 1500-1508; and Army Regulation 200-2, the U.S. Army intends to prepare an EIS to assist it in deciding on a plan for the reuse and/or disposal of the NPSHD. The purpose of the statement is to ensure that the U.S. Army makes an informed decision, based on full and informed public participation. The EIS will identify all relevant direct, indirect and cumulative environmental impacts associated with the alternatives considered.

**ALTERNATIVES:** The range of alternatives will address a series of options for reuse and/or disposal of the land on the buildings, structures and facilities within the NPSHD. Alternatives to be considered include the following:

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d. Complete rehabilitation of all structures. All structures located within the historic district will be rehabilitated for future use.

e. Excess, disposal, and sale at fair market value to a private entity.

**SCOPING:** This notice shall initiate a period of public scoping that is intended to invite the participation of all interested members of the public as well as other public agencies. Comments received during the scoping period will be used to assist the Army in identifying significant issues of public concern regarding potential impacts on the quality of the human environment. The scoping period will be followed by development of a reasonable range of reuse alternatives to be incorporated in a draft EIS. The draft EIS will be published and made available for public review and comment prior to its finalization. After review of the draft EIS, the U.S. Army will address public comments in a final EIS that will be released for additional review prior to publication of a Record of Decision (ROD). The ROD will identify the action chosen for implementation. Interested members of the public may be precluded from challenging the adequacy of the final EIS if they fail to participate in the process in a meaningful manner.

The Army will arrange a public scoping meeting within 30 days of the publication of this Notice of Intent at a place and time to be announced in the local sections of the "Washington Post", "Washington Times", and "Montgomery Journal" newspapers. Interested members of the public are invited to provide written comments to Mr. Ben Smith at Walter Reed Army Medical Center, ATTN: MCAT-PA (Ben Smith), 6900 Georgia Avenue, NW, Washington, DC 20307-5001, no later than 15 days following the public scoping meeting.

**FOR FURTHER INFORMATION:** Please contact Mr. Ben Smith, Public Affairs Officer, Walter Reed Army Medical Center, at (202) 782-3329.

Richard E. Newsome  
Acting Deputy Assistant Secretary of the Army  
(Environment, Safety and Occupational Health)  
OASA (I, L&E)

June 3, 1997

0271431



# AFFIDAVIT OF PUBLICATION

AD# \_\_\_\_\_

District Of Columbia, ss.

Personally appeared before me, \_\_\_\_\_  
a Notary Public in and for the District of Columbia

\_\_\_\_\_ who being duly sworn according  
to law, on oath says that he is an AUTHORIZED AGENT of  
NEWS WORLD COMMUNICATIONS, INC., publisher of

## **The Washington Times**

published daily, in the City of Washington, District of Columbia,  
and that the advertisement, of which the annexed is a true copy,  
was published in said newspaper \_\_\_\_\_ times(s) on the following dates:

\_\_\_\_\_  
\_\_\_\_\_

at the rate of \_\_\_\_\_ per line.

Total Cost \_\_\_\_\_ Dollars.

Subscribed and sworn to before me

\_\_\_\_\_  
19\_\_\_\_\_  
Notary Public

(Seal)

My commission expires \_\_\_\_\_

**NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL  
IMPACT STATEMENT (EIS) ON THE NATIONAL PARK SEMINARY  
HISTORIC DISTRICT (NPSHD) LOCATED AT THE  
WALTER REED ARMY MEDICAL CENTER (WRAMC)**

**AGENCY:** Walter Reed Army Medical Center, Department of the Army

**ACTION:** Notice of Intent

**SUMMARY:** The Army intends to prepare an EIS to assist it in deciding upon a plan of action for the NPSHD. The NPSHD, Forest Glen Annex, is located within the Forest Glen area of Montgomery County, Maryland, approximately 1.5 miles north of the District of Columbia. The annex is bounded by the Capitol Beltway (I-495) to the north, Rock Creek Park to the west, Brookville Road to the south, and the main line of the CSX Rail System to the east.

The NPSHD consists of a 26-acre parcel containing 24 buildings, which has been listed as an historic district on the National Register of Historic Places since 1972 and the Montgomery County Master Plan for historic preservation since 1991. The NPSHD is located on the north end of Forest Glen Annex and is bounded by the Capitol Beltway (I-495) to the north, Smith Drive on the east, and Linden Lane to the south and west. The NPSHD is comprised of a collection of late 19th and early 20th century architecturally eclectic buildings and structures associated with a land development company and later with a private finishing school. The Army, after acquisition in 1942, utilized the property and its improvements as a convalescent center through the late 1970's.

Since that time, Walter Reed Army Medical Center has utilized the NPSHD for administrative and logistical purposes such as offices and storage. In 1991, WRAMC determined that the NPSHD was excess to its needs. A recent review by Walter Reed Army Medical Center has revealed that retention of the real property comprising Forest Glen Annex, in its entirety, is necessary to meet mission requirements.

Consistent with its obligations under the National Environmental Policy Act, 42 U.S.C. 4321 et seq.; the regulations published by the Council on Environmental Quality, 40 CFR Part 1500-1508; and Army Regulation 200-2, the U.S. Army intends to prepare an EIS to assist it in deciding on a plan for the reuse and/or disposal of the NPSHD. The purpose of the statement is to ensure that the U.S. Army makes an informed decision, based on full and informed public participation. The EIS will identify all relevant direct, indirect and cumulative environmental impacts associated with the alternatives considered.

**ALTERNATIVES:** The range of alternatives will address a series of options for reuse and/or disposal of the land and the buildings, structures and facilities within the NPSHD. Alternatives to be considered include the following:

- a. No Action. The property would remain in caretaker status with the Department of the Army. Minimal maintenance and repairs would be accomplished.
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- c. Partial demolition of buildings and reuse of remaining rehabilitated structures. The buildings that would be torn down would be documented as described above. Remaining buildings would be rehabilitated and reutilized as described in the EIS.
- d. Complete rehabilitation of all structures. All structures located within the historic district will be rehabilitated for future use.
- e. Excess, disposal, and sale at fair market value to a private entity.

**SCOPING:** This notice shall initiate a period of public scoping that is intended to invite the participation of all interested members of the public as well as other public agencies. Comments received during the scoping period will be used to assist the Army in identifying significant issues of public concern regarding potential impacts on the quality of the human environment. The scoping period will be followed by development of a reasonable range of reuse alternatives to be incorporated in a draft EIS. The draft EIS will be published and made available for public review and comment prior to its finalization. After review of the draft EIS, the U.S. Army will address public comments in a final EIS that will be released for additional review prior to publication of a Record of Decision (ROD). The ROD will identify the action chosen for implementation. Interested members of the public may be precluded from challenging the adequacy of the final EIS if they fail to participate in the process in a meaningful manner.

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**FOR FURTHER INFORMATION:** Please contact Mr. Ben Smith, Public Affairs Officer, Walter Reed Army Medical Center, at (202) 782-7177.

RICHARD E. NEWSOME  
Acting Deputy Assistant Secretary of the Army  
(Environment, Safety and Occupational Health)  
OASA (I, L&E)

PROOF OF PUBLICATION

*The Washington Post*

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Player David well known to me to be Manager, Billing & Verification of The Washington Post, a daily newspaper printed and published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was printed and published in The Washington Post, a daily newspaper, upon the following date at a cost of \$1,758.00.

Published 1 time. Date 6/03/97  
Account C1339690

Player J. David

Witness my hand and official seal this 1<sup>st</sup> day of July 1997

Lucienne M. Chaffier  
My commission expires 11/11/02

Lucienne M. Chaffier  
Notary Public, District of Columbia  
My Commission Expires, Dec. 31, 2002

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NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT  
STATEMENT (EIS) ON THE NATIONAL PARK SEMINARY HISTORIC  
DISTRICT (NPSHD) LOCATED AT THE WALTER REED  
ARMY MEDICAL CENTER (WRAMC)

AGENCY: Walter Reed Army Medical Center, Department of the Army

ACTION: Notice of Intent

SUMMARY: The Army intends to prepare an EIS to assist it in deciding upon a plan of action for the NPSHD. The NPSHD, Forest Glen Annex, is located within the Forest Glen area of Montgomery County, Maryland, approximately 1.5 miles north of the District of Columbia. The Annex is bounded by the Capital Beltway (I-495) to the north, Rock Creek Park to the west, Brookville Road to the south, and the main line of the CSX Rail System to the east. The NPSHD consists of a 26-acre parcel containing 24 buildings, which has been listed as an historic district on the National Register of Historic Places since 1972 and the Montgomery County Master Plan for historic preservation since 1991. The NPSHD is located on the north end of Forest Glen Annex and is bounded by the Capital Beltway (I-495) to the north, Smith Drive on the east, and Linden Lane to the south and west. The NPSHD is comprised of a collection of late 19th and early 20th century architecturally eclectic buildings and structures associated with a land development company and later with a private finishing school. The Army, after acquisition in 1942, utilized the property and its improvements as a convalescent center through

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3 Ad # 5185 Name CH2M HILL Size 194 lines M0019  
Class 820' PO # PO 10563 Authorized by VIRGINIA F. Account C1339690

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Center, ATTN: MCAT-PA (Ben Smith), 6900 Georgia Avenue, NW, Washington,  
DC 20307-5001 no later than 15 days following the public scoping meeting.  
FOR FURTHER INFORMATION: Please contact Mr. Ben Smith, Public Affairs  
Officer, Walter Reed Army Medical Center, at (202) 782-7177.  
Richard E. Newsome  
Acting Deputy Assistant Secretary of the Army  
(Environment, Safety and Occupational Health)  
OASA(I,L&E)

Appendix B  
Report of Excess Real Property



DEPARTMENT OF THE ARMY  
OFFICE OF THE ASSISTANT SECRETARY  
INSTALLATIONS LOGISTICS AND ENVIRONMENT  
110 ARMY PENTAGON  
WASHINGTON DC 20310-0110

December 21, 1998

Honorable David J. Barram  
Administrator  
General Services Administration  
1800 F Street, N.W.  
Washington, D.C. 20405

Dear Mr. Barram:

I am writing to inform you that the Army currently intends to prepare a Report of Excess (ROE) for the Forest Glen Annex of Walter Reed Army Medical Center. The decision to excess Forest Glen is subject to the Army completing its consultation requirements under the National Historic Preservation Act (NHPA), evaluating the environmental impacts of the excessing action under the National Environmental Policy Act (NEPA), and the requirements of any other applicable law. The Army understands that GSA, as the disposal agent, will be responsible for evaluating the impacts of the disposal action under the NHPA and NEPA.

As such, we are writing to provide GSA adequate advance notice of the Army's excessing action. The Walter Reed Army Medical Center, Director of Public Works, and the Army Medical Command currently have on file several documents that GSA will find helpful in expediting the disposal process to include the Environmental Baseline Survey, Environmental Assessments, Facility Condition Assessments, Cultural Resources Management Plans, Re-use Feasibility Studies, and a myriad of other studies and reports performed on the National Park Seminary Historic District (NPSHD) at the Forest Glen Annex. Please contact Ms. Tracy Porter, Chief, Master Planning Branch, EP&S Division, Directorate of Public Works at (202) 782-7115, regarding the location of these and other pertinent documents, and to coordinate a time to inventory these resources, as well as any other questions you may have regarding the Forest Glen Annex.

Sincerely,

Paul W. Johnson

Deputy Assistant Secretary of the Army  
(Installations and Housing)  
OASA(I,L&E)

# REPORT OF EXCESS REAL PROPERTY

1. HOLDING AGENCY NO.

DATE RECEIVED (GSA use only)

2. DATE OF REPORT

GSA CONTROL NO. (GSA use only)

3. TO (Furnish address of GSA regional offices)  
General Services Administration

4. FROM (Name and address of holding agency)

5. NAME AND ADDRESS OF REPRESENTATIVE TO BE CONTACTED

6. NAME AND ADDRESS OF CUSTODIAN

7. PROPERTY IDENTIFICATION

8. PROPERTY ADDRESS (Give full location)

## 9. SPACE DATA

USE	NUMBER OF BUILDINGS (1)	FLOOR AREA (Sq. ft./M <sup>2</sup> ) (2)	NUMBER OF FLOORS (3)	FLOOR LOAD CAPACITY (4)	CLEAR HEADROOM (5)	(From SF 118B)	ACRE/HECTARE OR SQ. FT./M <sup>2</sup>
A. OFFICE						A. FEE	
B. STORAGE						B. LEASED	
C. OTHER (See 9F)						C. OTHER	
D. TOTAL (From SF 118A)						D. TOTAL	
E. GOV'T INTEREST:			F. SPECIFY "OTHER" USE ENTERED IN C ABOVE				
(1) OWNER							
(2) TENANT							

## 11. COST TO GOVERNMENT

ITEM	SCHEDULE	COST
A. BUILDINGS, STRUCTURES, UTILITIES, AND MISCELLANEOUS FACILITIES	A (Col. d)	\$
B. LAND	B (Col. f)	
C. RELATED PERSONAL PROPERTY	C (Col. h)	
D. TOTAL (Sum of 11A, 11B, and 11C)		\$
E. ANNUAL PROTECTION AND MAINTENANCE COST (Government-owned or leased)		

## 12. LEASEHOLD(S) DATA (Use separate sheet if necessary)

A. TOTAL ANNUAL RENTAL	\$
B. ANNUAL RENT PER SQ. FT./M <sup>2</sup> OR ACRE/HECTARE	\$
C. DATE LEASE EXPIRES	
D. NOTICE REQUIRED FOR RENEWAL	
E. TERMINAL DATE OF RENEWAL RIGHTS	
F. ANNUAL RENEWAL RENT PER SQ. FT./M <sup>2</sup> OR ACRE/HA.	\$
G. TERMINATION RIGHTS (in days)	
LESSOR	GOVERNMENT

13. DISPOSITION OF PROCEEDS

14. TYPE OF CONSTRUCTION

15. HOLDING AGENCY USE

16. RANGE OF POSSIBLE USES

17. NAMES AND ADDRESSES OF INTERESTED FEDERAL AGENCIES AND OTHER INTERESTED PARTIES

18. REMARKS

19. REPORT AUTHORIZED BY	NAME	SIGNATURE
	TITLE	



## Appendix C

### NHPA Section 106 Consultation



**Maryland  
Department of  
Housing and  
Community  
Development**

*Division of Historical and  
Cultural Programs*

100 Community Place  
Crownsville, Maryland 21032

410-514-7600

1-800-756-0119

Fax: 410-987-4071

Maryland Relay for the Deaf:

1-800-735-2258

<http://www.dhcd.state.md.us>

Parris N. Glendening  
*Governor*

Raymond A. Skinner  
*Secretary*

Marge Wolf  
*Deputy Secretary*

July 16, 1999

Mr. M. Ed Awni, Acting Director  
Directorate of Public Works  
Department of the Army  
Walter Reed Army Medical Center  
Washington, D.C. 20307-5001

Re: Proposed Excessing of National Park Seminary

Dear Mr. Awni:

On 16 June 1999, the Trust received your letter regarding the subject listed above. We understand that the Army is declaring 27 acres of the National Park Seminary Historic District, properties listed on the National Register of Historic Places, as excess. The Army has determined that the undertaking will have no adverse effect on the historic district.

In our opinion, the current details of the future of the National Park Seminary are too ambiguous to determine the effects of the excessing. Earlier consultations between the Army, the Trust and the Advisory Council determined that excessing of the property would necessitate the preparation and execution of a Programmatic Agreement. We feel that an agreement document that addresses the issues of the disposal from maintenance concerns to historic preservation easements is warranted. As the specifics of the disposal progress, the Trust looks forward to working with the Army, GSA, the Advisory Council and other consulting parties to develop an agreement which results in adequate protection and stewardship of the National Park Seminary Historic District. Should you have questions, please feel free to call Ms. Lauren Bowlin, of my staff, at 410-514-7637.

Sincerely,

Michael K. Day  
Chief, Office of Preservation Services

MKD/LLB/199901523

c: Mr. Ralston Cox (ACHP)





DEPARTMENT OF THE ARMY  
WALTER REED ARMY MEDICAL CENTER  
WASHINGTON, DC 20307-5001

REPLY TO  
ATTENTION OF:

June 11, 1999

Directorate, Public Works

Mr. J. Rodney Little  
State Historic Preservation Officer  
Maryland Historical Trust  
100 Community Place  
Crownsville, Maryland 21032-2023

Dear Mr. Little:

The purpose of this letter is to initiate consultation for the proposed excessing of the approximately 27-acre National Park Seminary Historic District, (identified as Parcel 1 on Enclosure 1) at the Forest Glen Annex to Walter Reed Army Medical Center. The property, listed in the National Register of Historic Places in 1972, includes 29 buildings, 24 of which are contributing resources, a fountain, and numerous statuary which are also contributing elements to the District. In addition, two adjacent parcels (2 and 3) totalling approximately 10 acres, may be declared excess as well.

The Army has determined the 27 acres excess to its needs and will report it as such to the General Services Administration (GSA) which will then dispose of the property. The entire disposal process, including all actions and responsible agencies, is explained and attached to this letter (Enclosure 2). This information corresponds to explanations provided at the meeting held on May 11, 1999 at Forest Glen to discuss the transfer with all involved local, regional and Federal planning agencies and governments.

We find that excessing the property to GSA will have no adverse effect on the properties, as Walter Reed will continue to provide security and maintenance to the structures until a new owner is found. As described in Enclosure 2, GSA will coordinate with your office concerning deed restrictions and covenants on the property once their NEPA process for transfer of the property begins.

We would like to enter into a No Adverse Effect Memorandum of Agreement for this project in order to comply with additional Army requirements on this property, and will continue consultation in order to do so.

**RECEIVED**

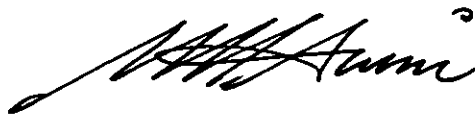
**JUN 14 1999**

**CH2M HILL/WDC**

-2-

If you have any questions regarding this matter, please contact Ms. Tracy Porter, Acting Chief, Master Planning Branch, EP&SD at (202) 782-7115, or Ms. Marjorie Marcus, Installation Master Planner, at (202) 782-6515.

Sincerely,

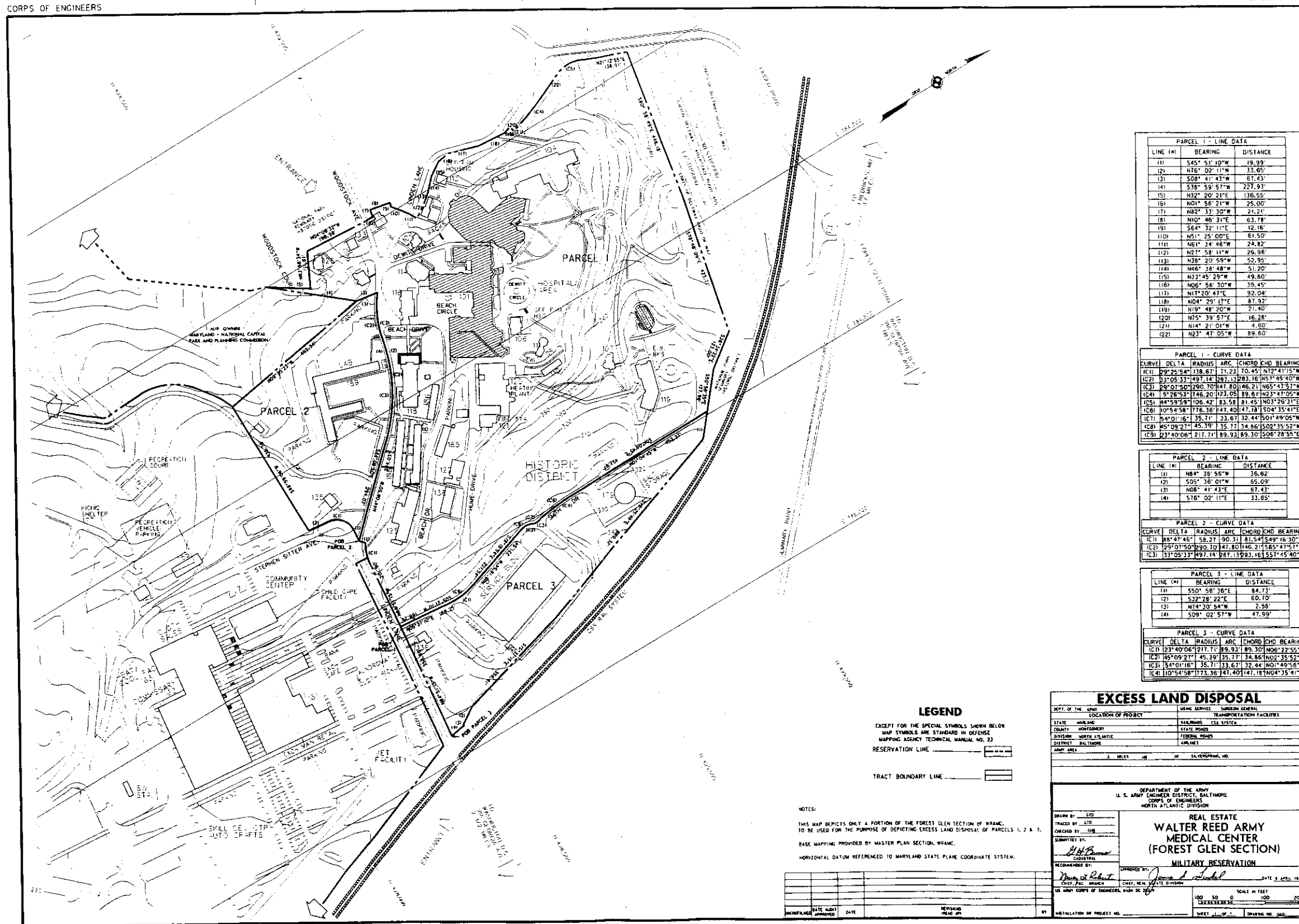


M. ED AWNI  
Acting Director  
Directorate of Public Works

Enclosures

Copies furnished:

Commander, WRAMC Garrison, Attn: COL Brown  
Chief, Environmental Division, WRAMC, Attn: LTC Sanders  
MCHL-JA, WRAMC, Attn: Mr. Ashby Dyke  
MCAT-PA, WRAMC, Attn: Mr. Ben Smith  
Advisory Council on Historic Preservation, Attn: Mr. Ralston Cox  
Executive Director, NCPC, Attn: Mr. Reginald Griffith  
GSA, Property Disposal Division, Attn: Mr. Ernest Cooper, Jr.  
GSA, Regional Historic Preservation and Fine Arts Officer, Attn: Ms. Audrey Entorf  
GSA, OGC, Attn: Mr. Richard Butterworth  
GSA, PBS, PRD, Washington, DC, Attn: Ms. Celia Brooks  
DASA (I&H), Attn: Mr. Don Manuel  
ACSIM, (DAIM-ED) Historic Preservation Officer, Attn: Ms. Caroline Fisher  
ACSIM, (DAIM-MD), Attn: Ms. Susan Habit  
ACSIM, SAOGC, Attn: Ms. Deidre Duncan  
USALC, Attn: Mr. Chris Wendelbo  
SFIM-AEC-JA, Attn: Mr. Scott Farley  
MEDCOM, MCFA-E, Attn: LTC John Becker  
MEDCOM, MCFA-E, Attn: Mr. Bobby Roberts  
CENAB-PL-E, Attn: Mr. Cliff Kidd  
CENAB-PL-E, Attn: Ms. Katherine Basye  
CH2MHill, Attn: Ms. Virginia Farris



## EXCESS LAND DISPOSAL

DEPT. OF THE ARMY	USING SERVICE	SUPPLEMENT GENERAL
STATE	WATERLAND	TRANSPORTATION FACILITIES
COUNTY	WATERGHEAT	STATE ROADS
DIVISION	NORTH ATLANTIC	FEDERAL ROADS
DISTRICT	BALTIMORE	AMHS
ARMY AREA	3 MILES	OF BALTIMORE, MD.

DEPARTMENT OF THE ARMY  
 U. S. ARMY ENGINEER DISTRICT, BALTIMORE  
 CORPS OF ENGINEERS  
 NORTH ATLANTIC DIVISION

REAL ESTATE  
 WALTER REED ARMY  
 MEDICAL CENTER  
 (FOREST GLEN SECTION)

MILITARY RESERVATION

DRAWN BY: STD  
 TRACED BY: STD  
 CHECKED BY: CHS  
 SUBMITTED BY:  
 RECOMMENDED BY:  
 DATE: 8 APRIL 1995

SCALE IN FEET  
 1" = 100'  
 SHEET 1 OF 1  
 DRAWING NO. 100

## Forest Glen/National Park Seminary Excess and Disposal Process

Responsible Party	Action	Estimated Time
Walter Reed Army Medical Center (WRAMC)	<p style="text-align: center;"><b>Report of Excess</b></p> <p>WRAMC reports historic district (of approximately 27-acres), including all structures, and possibly two additional parcels totalling approximately 10-acres, excess. Final determination on additional 10 acres will be made by WRAMC Commander before package is submitted to GSA. This process includes:</p> <ul style="list-style-type: none"> <li>▪ Environmental Assessment (anticipated finding of no significant impact)</li> <li>▪ Coordination with Maryland SHPO and completion of a Memorandum of Agreement, stating that declaration of excess will not adversely affect the historic district</li> <li>▪ Preparation of SF 118, the Report of Excess form submitted to GSA with all available environmental documentation, historic documentation, etc.</li> </ul> <p><i>During this time, the ownership and responsibility for the property will remain with WRAMC, and the Army will continue to provide security and maintenance.</i></p>	Present Time – Late Winter 2000
GSA	<p style="text-align: center;"><b>Federal Screening</b></p> <p>Upon acceptance of Report of Excess, Federal Screening can begin. During this step, GSA will screen the property through other Federal Agencies to determine if there is Federal interest in the property. If there is interest, the property would be transferred at a fair market value.</p> <p>Concurrent with the federal screening are two steps that must be completed by the announcement of the property for public sale. These include:</p> <ul style="list-style-type: none"> <li>▪ NEPA Documentation : Public involvement during this stage would allow for interested parties to voice their opinions through the local County Government on any deed restrictions or clauses that would restrict or govern future use of the property.</li> <li>▪ Coordination with Maryland SHPO for determination of covenants to be added to the deed (to convey with title) for the sale of the property. These may include restrictive clauses for the protection of specific structures.</li> </ul> <p>The NEPA documentation and the SHPO coordination are not limited to this step, and will run concurrently through the Disposal Process.</p> <p><i>During this time, ownership and responsibility of the property will remain with WRAMC, and the Army will continue to provide security and maintenance.</i></p>	(Although there are minimum timeframes attributed to GSA actions, it would be presumptuous for the Army to specify these here on behalf of GSA because the actions could take longer).

GSA	<p align="center"><b>Homeless Suitability Determination</b></p> <p>At this time, Housing and Urban Development (HUD) will screen the property for suitability for homeless or low income housing potential. Once a suitability determination has been made by HUD, an announcement would be placed in the Federal Register announcing the availability of this parcel for use by other public agencies. (45-day process)</p> <p><i>NEPA documentation and SHPO coordination are ongoing.</i></p> <p><i>During this time, ownership and responsibility for the property will remain with WRAMC, and the Army will continue to provide security and maintenance.</i></p>	
GSA	<p align="center"><b>Public Body Screening and Homeless Screening Notices</b></p> <p>Once the property has been determined non suitable by HUD, it would be determined surplus by GSA.. Then GSA would screen the property with local public bodies and homeless providers. Acceptable public uses include parks, education, health, and historic areas. (60 days)</p> <p>If there is interest for homeless use, an additional 90 days would be allowed to prepare the application for the Department of Health and Human Services.</p> <p><i>NEPA documentation and SHPO coordination are ongoing, but must be completed at the end of this phase</i></p> <p><i>During this time, ownership and responsibility for the property will remain with WRAMC, and the Army will continue to provide security and maintenance.</i></p>	
GSA	<p align="center"><b>Public Sale</b></p> <p>If no public body is found for the property, it would be advertised and marketed. By this stage, all environmental work would be complete; negotiations with the SHPO would have been finalized, and all restrictive covenants would be defined. The advertising and marketing of the parcel is expected to take 120 days, but is typically extended.</p> <p><i>During this time, ownership and responsibility for the property will remain with WRAMC, and the Army will continue to provide security and maintenance.</i></p>	

If no interested party is found, or no party is approved for the sale of the property, according to GSA OGC, negotiations would continue but with reduced deed restrictions in an effort not to return the property to WRAMC.

If the entire advertising and negotiation process takes longer than 18 months, the security and management procedures will need to be renegotiated with the Army.

## Appendix D

### Air Quality Standards and Conformity



National Ambient Air Quality Standards				
Pollutant	Primary (Health Related)		Secondary (Welfare Related)	
	Averaging Time	Standard Level Concentration <sup>(a)</sup>	Averaging Time	Standard Level Concentration
Particulate Matter (2.5 microns)	Annual Arithmetic Mean <sup>b</sup>	15 µg/m <sup>3</sup>		Same as Primary
	24-hour <sup>b</sup>	65 µg/m <sup>3</sup>		Same as Primary
Particulate Matter (10 microns)	Annual Arithmetic Mean <sup>b</sup>	50 µg/m <sup>3</sup>		Same as Primary
	24-hour <sup>b</sup>	150 µg/m <sup>3</sup>		Same as Primary
Sulfur Dioxide	Annual Arithmetic Mean	(0.03 ppm) 80 µg/m <sup>3</sup>	3-hours <sup>c</sup>	1300 µg/m <sup>3</sup> (0.50 ppm)
	24-hour <sup>c</sup>	(0.14 ppm) 365 µg/m <sup>3</sup>		
Carbon Monoxide	8-hour <sup>c</sup>	(9 ppm) 10 mg/m <sup>3</sup>		No Secondary Standard
	1-hour <sup>c</sup>	(35 ppm) 40 mg/m <sup>3</sup>		No Secondary Standard
Nitrogen Dioxide	Annual Arithmetic Mean	(0.053 ppm) 100 µg/m <sup>3</sup>		Same as Primary
Ozone	1-hour <sup>d</sup>	(0.12 ppm) 235 µg/m <sup>3</sup>	(0.08 ppm) 157 µg/m <sup>3</sup>	Same as New Primary
	8-hour	(0.08 ppm) 157 µg/m <sup>3</sup>		Same as Primary
Lead	Maximum Quarterly Average	1.5 µg/m <sup>3</sup>		Same as Primary
<p><b>NOTE:</b> In a May 14, 1999, decision of the District of Columbia Circuit Court of Appeals in the case of <i>American Trucking Associations, Inc., et al., v. United States Environmental Protection Agency</i>, the court sent the revised NAAQS for ozone and PM 2.5 back to EPA "for further consideration of all standards at issue." The court does not vacate the revised (8-hour) ozone standard, but says that in the interim -- while EPA is dealing with the remand -- the new standard "cannot be enforced."</p> <p><sup>a</sup>Parenthetical value is an approximately equivalent concentration.</p> <p><sup>b</sup>The annual standard is attained when the expected annual arithmetic mean concentration is less than or equal to 50 µg/m<sup>3</sup>, the 24-hour standard is attained when the expected number of days per calendar year above 150 µg/m<sup>3</sup> is equal to or less than 1, as determined according to Appendix K of the PM NAAQS.</p> <p><sup>c</sup>Not to be exceeded more than once per year.</p> <p><sup>d</sup>The one-hour standard is to be revoked in a given area when that area has achieved 3 consecutive years of air quality data meeting the 1-hour standard.</p> <p>Source: 40 Code of Federal Regulation 50.</p>				

**MEMORANDUM FOR FILE  
RECORD OF NON-APPLICABILITY  
TO THE GENERAL CONFORMITY RULE  
(40 CFR 51)**

PROJECT/ACTION NAME: Report of Excess Real Property for National Park Seminary Historic District, Forest Glen Annex, Walter Reed Army Medical Center  
Montgomery County, Maryland

PROPONENT: U.S. Army Medical Command

BEGIN DATE:

END DATE:

Conformity under the Clean Air Act, Section 176, has been evaluated for the above-described action, under Title 40, Code of Federal Regulations, Part 51(40 CFR 51). The requirements of this rule are not applicable to this action because:

☒ The action is described as an exempt action under 40 CFR 51.853.(c)(xiv):

"Transfers of ownership, interests, and titles in land, facilities, and real and personal properties, regardless of the form or method of the transfer."

and under 40 CFR 51.853.(c)(xx):

"Transfers of real property, including land, facilities and related personal property, from a Federal entity to another Federal entity and assignments of real property, including land, facilities and related personal property, from a Federal entity to another Federal entity for subsequent deeding to eligible applicants."

OR

☐ Total direct and indirect emissions from the action have been estimated at:  
\_\_\_\_\_ and are below the *de minimis* levels established at 40 CFR 51.853 (b) of:  
\_\_\_\_\_

**AND** The action is not considered "regionally significant" under 40 CFR 51.853.(i).

The supporting documentation is:

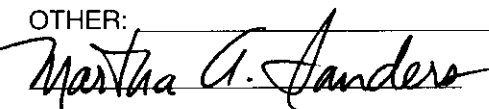
☐ ATTACHED

☒ ATTACHED TO NEPA DOCUMENT:

*Environmental Assessment  
National Park Seminary Historic District  
Forest Glen Annex, Walter Reed Army Medical Center*

☐ OTHER:

Responsible Official:



Martha A. Sanders  
Lieutenant Colonel, MS  
Chief, Garrison Environmental Office  
Walter Reed Army Medical Center

9/9/1999  
(date)

## Appendix E

### Description and Condition Assessment of Buildings

## APPENDIX E

### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
101a	The Main (Ye Forest Inne)	Poor	Poor	Deteriorated	1-MAJOR	The core building of the entire Seminary complex, designed by T.F. Schnieder and built in 1887. It was severely compromised with later additions and alterations but the basic three-story building remains in size and shape. Alterations include the removal of a look-out tower which used to rise above the main entry, a continuation of the south porch along the rear wing removed for the east wing addition, and pebble dash stucco applied over the wooden shingles of all the walls. Even with these alterations and additions to the building along each side and the rear, the building's massing and elements are clearly of Shingle Style architecture: asymmetrical forms, projecting towers, round and rectilinear features, fine woodwork, railings and decorative trim, and multi-faceted roof and dormer shapes. The gable roof along with projecting dormers, entry roofs and porch roofs are important elements. The shingle style wall elements, although compromised with stucco, are significant features. The various wooden "sticks," railings and columns and windows all contribute to significance of the building.
101b	Senior House	Poor	Poor	Deteriorated	1-MAJOR	The core building faces north, with an entry stair and porch on its east side and a major, faceted tower at the center of the north elevation. The building was covered in pebble dash stucco for the most part, with the exception of the projecting front and rear porches, which remain covered with wood shingles. Overall appearance similar to Ye Forest Inne. Even with the alterations, the building massing is clearly of the Shingle Style architecture. The slate roof, projecting dormers and round towers are important elements. The remaining shingle style porch, entry and dormer elements that have not been compromised with stucco are significant features. Senior House was the first dormitory building constructed for the Seminary complex; compromised by an annexation to adjacent buildings but still a major feature.
101c	Science Wing	Poor	Deteriorated	Deteriorated	3-Marginal	This is a small building, which has little integrity and is dwarfed by the Main and the Ballroom. The shingle style wall elements, even though compromised with stucco, are similar to those of the Main and are contributing features. The Science Building contributes to the site, but has little significance since it has been moved and its historic integrity severely compromised.

## APPENDIX E

### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
101d	West Wing/ Library	Poor	Deteriorated	Deteriorated	1-MAJOR	The "West Wing" extends the basement and upper three floors to the south. A monumental Greek temple portico was placed at the end of this extension. The interiors are typical double-loaded corridors with dormitory rooms at the upper levels. A library is on a portion of the first and basement floors. The stucco walls and window assemblies are similar to those at Ye Forest Inne. The "sticks" and decorative elements remain, but the field of each panel, which had been wood clapboards, are now stucco. The building massing and elements are clearly of the shingle style architecture. The Greek temple portico is a major contributing element of the exterior. The West Wing contributes to the site and forms part of the whole of the Main Building.
101e	Kitchen/ Dining Wing	Poor	Deteriorated	Deteriorated	1-MAJOR	This addition extends each of the basements and three upper floors of the Main to the east. There are several projecting towers, a covered walkway, and a decorative stone chimney. The one story kitchen wing duplicates the stepped parapets of the adjacent Spanish styled Power House and Firehouse. The stucco walls and window assemblies are similar to those at Ye Forest Inne. At the three story wings, the main "sticks" and decorative elements remain, but the field of each panel, which had been wood clapboard, is now stucco. The building massing and elements are clearly of the shingle style architecture. The Kitchen/Dining Wing contributes to the site and forms an important termination element for the Main Building.
101f	Senior Annex (Senior House)	Poor	Deteriorated	Deteriorated	2-Contributing	This addition links to both Senior House and the Music Hall. There are projecting bay windows on both the front and rear and side elevations. The roof is complex with two rows of dormers and projecting gable ends. The stucco walls and window assemblies are similar to those at Ye Forest Inne, without the "sticks" or other applied decorative elements. The building massing and elements are clearly of the shingle style architecture. The Senior House Annex contributes to the site and forms an important element for the Main Building.

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### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
101g	President's House	Poor	Poor	Poor	2-Contributing	The President's House is a very large scale residential structure placed against the Main and Senior House. The house has a projecting tower on the northwest corner, which is an important visual element for the Main. The stucco walls and window assemblies are similar to those at Ye Forest Inn, although the detailing is simpler, omitting "sticks" and other applied decorative elements. The building is placed on a stone foundation wall base, which forms the lower level. The stucco covering is on the main, second and third floors, giving the appearance of a piano nobile alignment. This building has fewer of the shingle style elements and would be considered more of a Richardsonian style. The President's House has a distinctive appearance and character.
101h	Ballroom (Ament Hall)	Poor	Poor	Poor	1-MAJOR	The building encloses a monumental ballroom space, which is three stories in height and about 40 feet wide by 70 feet long. Dormitory rooms, offices and classrooms encircle the ballroom on the upper levels. The multiple gable windows at the roof are a major element of the exterior, while the walls are simpler in design than most of the adjacent Main. The exposed stone foundation walls are a major contributing element. Ament Hall (ballroom) has a distinctive appearance and character and the interior space is of monumental scale and significance to the site.
(104)	(Odeon Theater)	(N/A)	(N/A)	(N/A)	(N/A)	This building was destroyed by fire in 1993.
104	Music Hall	Deteriorated	Deteriorated	Unstable	3-Marginal	This addition linked the Odeon Theater to the Senior House Annex. Long, rectangular two-story building with a two story Ionic portico on the east elevation and a perpendicular row of Ionic columns at the former connection to the Odeon. A gable roof runs along the long axis of the Music Hall. The stucco walls and window assemblies were similar to those at the Odeon Theater. The building massing and elements are clearly of the classical revival style popularized by the Colombian Exposition of 1893: ionic columns, decorative entablature, and tall windows. The Music Hall no longer contributes to the site due to the loss of the Odeon Theater.

## APPENDIX E

### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
106	American Bungalow	Poor	Poor	Deteriorated	1-MAJOR	The American Bungalow is an excellent example of an early California Bungalow. It is rectangular in plan, with a symmetrical design. The sloping site creates a 1-1/2 story front elevation, and a 2-1/2 story rear elevation. Flared roof with side-gables and one gable dormer at front facade. One story front porch supported by squared, shingle clad piers. Roof is integral with side walls. The exterior wooden shingles, metal porch roofing and the diamond paned windows are distinctive. The Bungalow style of this residential scale building constitutes a major contributing element to the site. It is generally intact in its original configuration.
107	Castle	Unstable	Deteriorated	Unstable	1-MAJOR	A pair of stucco clad, crenellated towers with a one story crenellated stone addition. Randomly placed widows and a large drawbridge to a footbridge create a highly picturesque example of a "folly" from an old English country garden. The leaded glass windows are distinctive. Existing stucco and stone finish is original. The Castle motif of this residential scale building constitutes a major contributing element to the site. It is generally in its original configuration..
108	Japanese Pagoda	Poor	Poor	Poor	1-MAJOR	The three-tier pagoda form and detail elements are basically intact, although in poor condition. This is a building of major significance to the site. The exterior shape and details are intact and should be preserved. The wooden roof and railing shapes are significant. The exterior, pagoda shape is unique and the building is an important example of the sorority house elements at the site.
109	Japanese Bungalow	Poor	Poor	Poor	1-MAJOR	The Japanese Bungalow is square in plan, with an asymmetrical design. The sloping site creates a 1-1/2 story front elevation, and a 2-1/2 story rear elevation. Hip roof with bay windows at front and dormers at both side elevations. One story front porch supported by square wood columns with curved wood brackets. The exterior wooden clapboard, beaded-board siding and diamond paned windows are distinctive and should be retained. The Bungalow style of this residential scale building constitutes a major contributing element to the site. It is generally intact, in its original configuration.

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### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
110	Colonial House	Poor	Deteriorated	Fair	1-MAJOR	It is a symmetrical, rectangular two-story building of classical revival design, with a two story Tuscan portico on the north elevation. Window groupings are Palladian, with oversize lunettes. The stucco walls with decorative swag ornament, deep entablature, grouped window assemblies and porch columns are significant elements.
111	Windmill	Poor	Poor	Poor	1-MAJOR	The Windmill shape remains very much intact with a central, octagonal three-story tower, with two, one-story attachments to either side. The tower has a balcony at the upper-most level that extends around the entire level. Views from this tower extend to the north, across the ravine, and to the south, to the Main. This basic shape and configuration are distinctive and significant. The exterior wooden shingles and the elements of the windmill tower are distinctive. The exterior, windmill appearance of this residential scale building constitutes a major contributing element to the site. It is generally intact, in its original configuration.
112	Indian Mission	Poor	Poor	Deteriorated	2-Contributing	The "tee-shaped" foot print of the Indian Mission is intact, however, with the former patio/roof garden removed and replaced with a low pitched roof, the original appearance of the front facade is substantially altered and reduced. The remaining mission style features are distinct. The exterior stucco, mission style features, and windows are contributing elements, which also contributes to the historic and architectural themes of the site.
113	Swiss Chalet	Poor	Poor	Fair	1-MAJOR	The Chalet is configured in a square, balanced box vernacular design. The sloping site creates 1-1/2 story building at the south, over a raised basement, and 2-1/2 stores at the rear. The roof is composed of intersecting gables with gently scalloped bargeboards and foot braces at the eaves. The exterior wooden beaded board siding, decorative eaves, surrounding porches and diamond paned windows are distinctive. The exterior, chalet appearance of this residential scale building constitutes a major contributing element to the site.



## APPENDIX E

### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
114	Chapel	Poor	Deteriorated	Unstable	1-MAJOR	The building encloses the large interior worship space and has a tall bell tower at the front. The building is connected to the Main so that its form and integrity are compromised. The exterior pebble dash stucco is a contributing feature, consistent with the other Seminary buildings. The tall, stained glass windows are a major contributing feature and are not found in other Forest Glen structure. As with most religious structures, the size and shape are unique and the historic associations and architectural style make this a major contributing building. However, it is in deteriorated condition at this time and has been unoccupied for 9 years.
115	Miller Library	Fair	Poor	Fair	1-MAJOR	The library retains its rectangular, vertical, balanced design. The structure is two stories with a hip roof and an oriole window at the second floor south side. The exterior wooden shingles, oriole window and second story porch are distinctive and should be retained. The exterior, shingle style appearance of this residential scale building constitutes a major contributing element to the site. It is generally intact, in its original configuration.
116	Aloha House	Poor	Deteriorated	Poor	2-Contributing	The Aloha House is a rectangular, three story wood framed structure with basement and a gambrel roof with several projecting one and two story dormers. There is a one story covered porch extending across the north façade, which consists of brick arches with caryatid columns. A three-story brick fire stair is located at the northeast corner of the house. Original wood double hung and casement windows are still in place and remain largely intact. Original shingle roofing is still in place at several of the shallow pent roof extensions at the face of the roof dormers. Since the Aloha House has undergone two significant interior remodeling efforts, the exterior walls remain as the only significant historic feature of the building. The overall exterior massing of the building remains largely unchanged. If the original cedar shake siding is still in place beneath the pebble dash stucco exterior cladding, it may be possible to return the building's exterior surfaces to their original appearance.

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### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
118	Gymnasium	Deteriorated	Unstable	Deteriorated	1-MAJOR	Three story rectangular structure with a hip roof set back from a colonnaded full height portico. There is a one-story extension at the rear (east) end of the building. Overall dimensions are 52' by 126'. The building massing and elements are clearly of the classical revival style popularized by the Colombian Exposition of 1893: Corinthian columns, decorative entablature, and window trim, tall windows. The pebble dash stucco finish matches the other buildings at the school. The Gymnasium is has a distinctive appearance and character and the exterior appearance is of monumental scale and significance to the site.
119	Villa	Poor	Poor	Poor	1-MAJOR	Built in 1907, architect unknown. Large, three-story building, angled at the center to form a "dog-leg" shape. The interiors are typical double-loaded corridors with dormitory rooms at all three levels. There is a grand stairway at the western terminus with reception areas at each floor. A second, simpler stairway is located at the center of the Villa. The twin roof towers, central bell tower, projecting dormers and balconies are important elements. The Spanish style wall elements, arched basement openings, and stepped parapets are significant features. The Villa remains the central, pivotal building for the northeast side of the glen.
120	Practice House (Power Plant)	Poor	Poor	Deteriorated	2-Contributing	The Power Plant (Practice House) is a rectangular building. Its roof is composed of intersecting major and minor gables with "Mission" style parapets at the gable ends. The sloping site creates a 2-1/2-story building at the main service road, and 3-1/2 stories at the rear. The Maid's Quarters and Practice House form a rectangular building. The shingle style architecture of both buildings relates to the original architecture of the Forest Inn. The painted smooth stucco finish on brick is common to several service structures in this area: The Servant's Quarters, Carriage House, and Carpentry Shop. The use of "Mission" style gable ends, wall and window detailing, is also typical of each of these structures. The exterior, mission style and shingle style appearances of these buildings, along with the classical Portico, are important contributors to the historic and architectural themes of the site.

## APPENDIX E

### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
121	Carriage House (Fire Station)	Fair	Fair	Good	2-Contributing	The Carriage House is a well built, brick and stucco building in the Mission style. The windows have a raised, but simple architrave in stucco. The end gable shapes, in the mission style, are similar to those on the other adjacent service buildings. This building sits below many vantage points so the roof materials and dormers are important contributing elements. The exterior smooth finish stucco is a contributing feature, consistent with the other utilitarian buildings at the Seminary. The building should be viewed in its association with the other adjacent mission style buildings.
122	Carpentry Shop	Poor	Deteriorated	Poor	2-Contributing	The primary structure has a roughly square plan with a central stair. The adjoining structure has a narrow plan comprised of a series of square rooms. The secondary structure has no interior stair. The Spanish gable roof is typical of several service structures in this portion of the site. Exterior finish material and Spanish gables are significant.
125	Stable (Carroll House Shelter)	Poor	Poor	Good	2-Contributing	The building has a long rectangular plan with a square central core that projects forward at the front elevation. The building footprint is roughly 150' x 50', with crossed gable roof, gable dormers and a tower with Spanish style parapets. This parapet ties the stable stylistically to other structures in this portion of the site. Spanish style parapets are the primary contributing elements. This building does not contribute significantly to the historic integrity of the site.
126	Postmaster's House	Poor	Poor	Fair	3-Marginal	The building is a square plan 2-story brick structure with 3 symmetrical bays and an enclosed side porch addition with stair. The building is built into a hillside so that the front elevation is a full two stories and the rear elevation is one. There is a square hip roof with a single centralized chimney. The use of red brick is typical of finer homes of this period. Arched masonry window and door heads are significant brick detailing of the period. Because of its location outside of the Seminary site, it probably cannot be viewed as contributing to Forest Glen.
133	Edgewood	Poor	Poor	Deteriorated	3-Marginal	Built in 1900-01 as a residence in the subdivision of Forest Glen, later leased by the school. Queen Anne-style building with hipped roof, projecting dormers, and full porch. Wooden "Stick Style" trim is a defining feature. This building is condemned.

## APPENDIX E

### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
135	Chauffeur's House <sup>1</sup>	N/A <sup>2</sup>	Poor	Not assessed <sup>2</sup>	3-Marginal	Located in Parcel 2. Square, wood-frame structure with one-story wrap-around porch. Hipped roof with projecting hipped dormers cap the building.
136	Carpenter's Cottage (Thrift Shop) <sup>1</sup>	Fair	Poor	Fair	3-Marginal	Located in Parcel 3. Simple, L-shaped, wood-frame structure terminating in a front gable. Decorative scalloped shingles embellish the gable ends. A one-story, shed roof porch extends across the front elevation. The roof is sheathed in asphalt replacement shingles. The windows of all three buildings are double-hung, wood-sash units.
138	Servant's Quarters	Poor	Deteriorated	Poor	3-Marginal	The building is rectangular and measures approximately 30' by 80'. The reconfigured interior stair is located near the west end of the structure adjacent to the shower rooms. There is no interior access to the attic space. The painted smooth stucco finish on brick is common to several service structures in this area. The use of "Mission" style gable ends, wall and window detailing, is also typical. This structure does not contribute significantly to the historic integrity of the site.
139	Poultryman's Cottage <sup>1</sup>	Poor	Poor	Fair	3-Marginal	Located in Parcel 2. Square, wood-frame structure with one-story wrap-around porch. Hipped roof with projecting hipped dormers cap the building. This building was damaged by a falling tree in 1992 and has been condemned.
149-A	Root Cellar (storage bunker)	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	3-Marginal <sup>3</sup>	Built in 1907, small storage structure built into the side of a hill opposite the Fire Station. Considered to be contributing but is not further discussed as a resource.
144	Pump House/Valve House (storage)	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	3-Marginal <sup>3</sup>	Built in 1907, this small utility structure is considered contributing but is not further discussed as a resource.
160	Transformer vault (PEPCO metering station)	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	4-None	Built in 1942, non-contributing military utility structure. Owned by the Army but maintained by PEPCO. Provides electrical service to all the buildings in the NPSHD and several others nearby.
185	Medical Research Laboratory	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	4-None	Non-historic, intrusive, concrete block structure built in the 1950's

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### Description and Condition Assessment of Buildings in the NPSHD and the Additional Parcels

Building Number	Building Name	Condition Assessment			Historic Significance	Description
		Systems	Exterior	Interior		
186	Medical Research Laboratory	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	4-None	Non-historic, intrusive, concrete block structure built in the 1950's
187	Medical Research Laboratory	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	4-None	Non-historic, intrusive, concrete block structure built in the 1950's
188	Medical Research Laboratory	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	4-None	Non-historic, intrusive, concrete block structure built in the 1950's
189	R&D Laboratory <sup>1</sup> (Sleep Lab)	N/A <sup>3</sup>	N/A <sup>3</sup>	N/A <sup>3</sup>	4-None	Located in Parcel 2. Non-historic concrete block structure built in the 1950's. Building 189 is scheduled to be demolished as part of the WRAIR project.

## KEY AND NOTES

1. These historic buildings are located outside the boundaries of the Historic District, but they are included in the proposed Expanded Historic District and they are located on the additional Parcels 2 and 3 that are being considered for excessing along with the NPSHD (Parcel 1).
2. Residence was occupied at the time of the field investigation; interior was not accessible for survey.
3. Not evaluated in the *Facility Condition Assessment* report

Codes	Condition
Good	Building or system about 10 years old, remaining service life less than 20 years. Routine annual maintenance needed to maintain condition.
Fair	System or material aged and in need of rehabilitation, although serviceable. Probably near end of expected service life, but with major rehabilitation, could be upgraded to excellent condition.
Poor	Materials: severe aging evident—peeling, cracking, stains, color changes, and corrosion. Service life near end. Building systems: continued functionality in question. Major rehabilitation need to correct poor condition. Replacement should be strongly considered.
Deteriorated	Severe deterioration of long standing. Peeling, deep cracks, dark stains, and severe corrosion could be present. Material or system can function but functionality well below expectations for similar new elements. Replacement may be the only viable option.
Unstable	Structural or physical condition is so poor that continued functionality in question. If no comprehensive repairs are undertaken, system failure is a probability.
N/A	Not assessed. (The Facility Use Study assumed the non-historic buildings in the NPSHD would be demolished as part of any future adaptive reuse of the Historic District.)
<u>Source:</u> <i>Facility Condition Assessment</i> , October 1996	
Codes	Historic Significance
1-MAJOR	Major contributing building
2-Contributing	Contributing building
3-Marginal	Contributing building with marginal historic significance
4-None	Non-contributing, intrusive buildings located within the boundaries of the Historic District
<u>Source:</u> <i>Facility Condition Assessment</i> , October 1996	
Descriptions of buildings not evaluated in this study are from the 1998 Draft Integrated Cultural Resources Management Plan and 1999 site visits.	
<u>Note:</u> As recommended by the study team. The qualitative assessments and ratings (codes 1-3) concerning the relative historic significance of the contributing buildings have not been coordinated with the Maryland SHPO.	

# Acronyms and Abbreviations

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ACHP	Advisory Council on Historic Preservation
ACM	Asbestos-containing material
ADA	Americans with Disabilities Act
AFIP	Armed Forces Institute of Pathology
AR	Army Regulation
AST	Aboveground storage tank
BAQ	Basic Allowance for Quarters
BEA	(U.S.) Bureau of Economic Analysis
BWI	Baltimore-Washington International (Airport)
CAA	Clean Air Act
CBD	Central Business District
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	<i>Code of Federal Regulations</i>
CMSA	Consolidated Metropolitan Statistical Area
CO	Carbon monoxide
CRMP	Cultural Resources Management Plan
CWA	Clean Water Act
DA PAM	Department of the Army Pamphlet
dbh	Diameter at breast height
DOD	Department of Defense
DOI	Department of the Interior
EA	Environmental Assessment
EBS	Environmental Baseline Study
ECOP	Environmental Condition of Property

EIS	Environmental Impact Statement
EPA	U.S. Environmental Protection Agency
FCA	Facility Condition Assessment
FGIC	Forest Glen Improvement Company
FIDS	Forest Interior Dwelling (Bird) Species
FOSL	Finding of Suitability to Lease
FOST	Finding of Suitability to Transfer
FNSI	Finding of No Significant Impact
FPASA	Federal Property and Administrative Services Act of 1949
FPMR	Federal Property Management Regulations
FY	fiscal year
FRP	fiberglass-reinforced plastic
GSA	General Services Administration
GSF	gross square foot
HABS	Historic American Building Survey
HAER	Historic American Engineering Record
HCM	<i>Highway Capacity Manual</i>
HHS	Department of Health and Human Services
hp	horsepower
HUD	Department of Housing and Urban Development
IR	Installation Restoration
KFS	Kise Franks and Straw
kVA	kilovolt ampere
LOS	Level of Service
MARC	Maryland Rail Commuter
MCPS	Montgomery County Public Schools
MDE	Maryland Department of the Environment
MDNR	Maryland Department of Natural Resources
MEDCOM	U.S. Army Medical Command



MHT	Maryland Historical Trust
M-NCPPC	Maryland National Capitol Parks and Planning Commission
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
MOP	Maryland Office of Planning
mph	miles per hour
msl	mean sea level
MWCOG	Metropolitan Washington Council of Governments
NAAQS	National Ambient Air Quality Standards
NARMC	North Atlantic Regional Medical Command
NCPC	National Capital Planning Commission
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NOI	Notice of Intent
NOx	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NPS	National Park Service
NPSHD	National Park Seminary Historic District
NRC	(U.S.) Nuclear Regulatory Commission
NRHP	National Register of Historic Places
PA	Programmatic Agreement
Pb	Lead
PCB	polychlorinated biphenyls
pCi/l	picoCuries per liter
PEPCO	Potomac Electric Power Company
PFUS	Preliminary Facility Use Study
PL	Public Law
PM-10	particulate matter less than 10 microns in aerodynamic diameter
PMSA	Primary Metropolitan Statistical Area

ppm	parts per million
psi	pounds per square inch
PX	post exchange
RCRA	Resource Conservation and Recovery Act
ROD	Record of Decision
ROI	region of influence
SARA	Superfund Amendments and Reauthorization Act of 1986
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SOS	Save Our Seminary
UBC	Uniform Building Code
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
VHA	Variable Housing Allowance
VOC	volatile organic compound
vpd	vehicles per day
WMATA	Washington Metropolitan Area Transportation Authority
WRAMC	Walter Reed Army Medical Center
WRAIR	Walter Reed Army Institute of Research
WSSC	Washington Suburban Sanitary Commission